

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SHABTAI SCOTT SHATSKY, *et al.*,

Plaintiffs,

v.

THE PALESTINE LIBERATION
ORGANIZATION and THE PALESTINIAN
AUTHORITY,

Defendants.

Case No. 18-cv-12355 (MKV) (DCF)

**DECLARATION OF OLIVER S. HAKER IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO DEFENDANTS'
MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION**

OLIVER S. HAKER, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am an attorney admitted to practice before the courts of the State of New York and before this Court, and I am a Counsel at Cohen & Gresser LLP, attorneys for Plaintiffs in this action. I submit this declaration in opposition to the motion by defendants The Palestine Liberation Organization (the “PLO”) and The Palestinian Authority (the “PA” and, together with the PLO, “Defendants”) to dismiss this action, under Rule 12(b)(2) of the Federal Rules of Civil Procedure, for lack of personal jurisdiction (the “Motion”). The purpose of this declaration is to place before the Court documents and information relevant to the issue of the PLO’s and the PA’s consent to the exercise of personal jurisdiction in this action under the Promoting Security and Justice for Victims of Terrorism Act (“PSJVTVA”), Pub. L. No. 116-94, § 903 (codified at 18 U.S.C. § 2334(e)).

2. Attached as Exhibit 1 is a true and correct copy of excerpts of the transcript of the deposition of Riyad Mansour, conducted on July 8, 2021 in connection with jurisdictional discovery in this action.

3. Attached as Exhibit 2 is a true and correct copy of excerpts of the transcript of the deposition of Nadia Ghannam, conducted on July 23, 2021 in connection with jurisdictional discovery in this action.

A. Consent Under Subparagraph (e)(1)(A) of the PSJVTA

4. Subparagraph (e)(1)(A) of the PSJVTA provides that Defendant The Palestinian Authority (“PA”) or Defendant The Palestinian Liberation Organization (“PLO”) “shall be deemed to have consented to personal jurisdiction” in Anti-Terrorism Act (“ATA”) cases if, after April 18, 2020, they “make[] any payment, directly or indirectly—”

- (i) to any payee designated by any individual who, after being fairly tried or pleading guilty, has been imprisoned for committing any act of terrorism that injured or killed a national of the United States, if such payment is made by reason of such imprisonment; or
- (ii) to any family member of any individual, following such individual’s death while committing an act of terrorism that injured or killed a national of the United States, if such payment is made by reason of the death of such individual.

18 U.S.C. § 2334(e)(1)(A).

5. Below, I summarize testimony by Defendants, and records produced by Defendants, in this litigation concerning payments made to designees and/or family members of individuals who were imprisoned for committing acts of terrorism after being tried or pleading guilty, or who died while committing acts of terrorism, that injured or killed a U.S. national, and payments made to such individuals by reason of their imprisonment or death.

6. Where appropriate, I refer to (a) summaries of information contained in the Declaration of Arieh Dan Spitzen dated October 2, 2021 (“Spitzen Decl.”) and the Declaration of Nick Kaufman dated September 30, 2021 (“Kaufman Decl.”), which Plaintiffs also filed in opposition to the Motion; and (b) public-source information concerning the acts of terrorism described herein.

7. Attached hereto as Exhibit 255 is a true copy of a stipulation between the parties to this action, dated August 3, 2021, that documents produced by Defendants in connection with jurisdictional discovery in this action, bearing the following production numbers, are records of a regularly-conducted activity of the PLO or the PA for purposes of Rule 803(6) of the Federal Rules of Evidence: Shatsky-JD00001-00010, Shatsky-JD00012-00534, and Shatsky-JD00559-02025.

Defendants' Payments to Family Members of Individuals Killed While Committing Acts of Terrorism that Injured or Killed U.S. Nationals by Reason of the Deaths of Such Individuals.

8. Attached as Exhibit 3 is a true and correct copy of excerpts of the transcript of the deposition of Farid Ahmed Abed Hafez Ghannam, conducted on July 29 and 30, 2021 in connection with jurisdictional discovery in this action. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

9. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11. [REDACTED]

[REDACTED]

12. [REDACTED]

13. [REDACTED]

14. [REDACTED]

15. [REDACTED]

16. ***Sadeq Abdel Hafez.*** “On February 16, 2002, a suicide bomber attacked a pizzeria in Karnei Shomron, a town in the West Bank. The bombing killed United States citizens Keren Shatsky and Rachel Thaler and wounded United States citizens Steven Braun, Chana Friedman,

Leor Thaler, and Hillel Trattner.” *Shatsky v. Palestine Liberation Org.*, 955 F.3d 1016, 1022 (D.C. Cir. 2020). *See also* Ex. 4 (*Patterns of Global Terrorism Report*, U.S. Dep’t of State, Bureau of Counterterrorism and Countering Violent Extremism (2002) at 1 (“On 16 February, a suicide bomber detonated a device at a pizzeria in Karnei Shomron in the West Bank, killing four persons and wounding 27 others. Two US citizens—Keren Shatsky, and Rachel Donna Thaler—were among the dead”)).

17. “Sadeq Abdel Hafez” died perpetrating the attack. *See* Spitzen Decl. ¶ 61. *See also* Ex. 44 (*Suicide Terrorists in the Current Conflict*, ISRAELI SECURITY AGENCY) at 14 (“Zadek Abd al-Hafat,” a member of the Popular Front for the Liberation of Palestine, perpetrated the attack) (a copy of the relevant sections of the translated report is attached as Exhibit 44).¹

18. Rachel Thaler, a U.S. citizen, was killed in the February 16, 2002 attack. *See* Ex. 4 at 1; Exhibit 5 (copy of relevant pages of Rachel Thaler’s U.S. passport, date of issue July 11, 2001).

19. Keren Shatsky, a U.S. citizen, was killed in the February 16, 2002 attack. *See* Ex. 4 at 1; Exhibit 6 (excerpts of transcript of deposition of Shabtai Scott Shatsky dated January 28, 2013) at 18-19 (testifying that he and his wife are American citizens, and their children, including Keren Shatsky, are dual American-Israeli citizens); Exhibit 7 (copy of Keren Shatsky

¹ In some instances, English transliterations of the Arabic names of certain individuals identified in this declaration may differ slightly from the transliterations of those names in documents attached to this declaration, including certified translations of documents produced by Defendants in connection with jurisdictional discovery in this action. Where such discrepancies exist, the names listed in this declaration and in the accompanying documents are believed to refer to the same individual.

Certification of Birth Abroad of a Citizen of the U.S., dated November 12, 1987); Exhibit 8 (copy of relevant pages of Keren Shatsky's U.S. passport).

20. Hillel Trattner, a U.S. citizen, was injured in the February 16, 2002 attack. *See* Exhibit 9 (copy of relevant pages of Hillel Trattner's U.S. passport, date of issue July 11, 1997); Ex. 10 (excerpts of February 12, 2013 deposition transcript of Hillel Trattner) at 9, 21, 25-29 (testifying that he is a citizen of the "United States and Israel" and was injured in the February 16, 2002 terrorist attack).

21. Leor Thaler, a U.S. citizen, was injured in the February 16, 2002 attack. *See* Exhibit 11 (excerpts of February 6, 2013 deposition transcript of Leor Thaler) at 13, 80-85 (testifying that he is a citizen of the United States, England and Israel, and describing the February 16, 2002 terrorist attack and his resulting injuries); Exhibit 13 (copy of relevant pages of Leor Thaler's U.S. passport, date of issue May 31, 2002).

22. Chana Friedman, a U.S. citizen, was injured in the February 16, 2002 terrorist attack. *See* Exhibit 14 (excerpts of February 11, 2013 deposition transcript of Chani Edri [Friedman]) at 10, 13, 102-118 (testifying she is a citizen of the United States and Israel, and describing the February 16, 2002 terrorist attack and her resulting injuries); Exhibit 15 (copies of relevant pages of Chana Freedman's U.S. passports, dates of issue February 19, 1998 and July 21, 2003).

23. Steven Braun, a U.S. citizen, was injured in the February 16, 2002 terrorist attack. *See* Exhibit 16 (copy of relevant pages of Steven Braun's U.S. passport, date of issue February 28, 2000); Exhibit 17 (excerpts of February 5, 2013 deposition transcript of Steven Braun) at 38-45 (testifying regarding his injuries from the February 16, 2002 attack).

24. Attached as Exhibit 249 are copies of relevant pages of United States' passports for the following Plaintiffs in this action: Shabtai Scott Shatsky, Jo Anne Shatsky, Tzippora Shatsky Schwarz, Yoseph Shatsky, Sara Shatsky Tzimmerman, Miriam Shatsky, David Raphael Shatsky, Michael Thaler, Zvi Thaler, Isaac Thaler, Aron S. Trattner, Shelley Trattner, Ilan Friedman, Miriam Friedman, Yehiel Friedman, Zvi Friedman, and Bella Friedman. *See also* Ex. 6 at 18-19 (Shabtai Scott Shatsky testifying that he and his wife are American citizens, and their children are dual American-Israeli citizens). Attached as Exhibit 12 is a copy of Plaintiff Efrat Trattner's Certification of Birth Abroad of a Citizen of the U.S., dated April 29, 1985. Attached as Exhibit 253 is a copy of Hadassah Trattner's Illinois Certificate of Live Birth, dated March 14, 1980). Attached here to as Exhibit 254 is a copy of Yael Trattner's Illinois Certificate of Live Birth, dated October 9, 1975.

25. Attached as Exhibit 18 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

26. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

[REDACTED]

d. [REDACTED]

[REDACTED]

27. [REDACTED]

[REDACTED]

28. [REDACTED]

[REDACTED]

[REDACTED]

29. [REDACTED]

[REDACTED]

[REDACTED]

30. [REDACTED]

[REDACTED]

31. Attached as Exhibit 19 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

32. [REDACTED]

[REDACTED]

[REDACTED]

33. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

34. [REDACTED]

[REDACTED]

[REDACTED]

35. [REDACTED]

[REDACTED]

[REDACTED]

36. ***Abdel-Muti Mohammad Saleh Shabaneh.*** “On June 11, 2003, a Hamas suicide bomber blew up Egged bus number 14A. One of the deadliest attacks of the year, the explosion killed 17 people, including [U.S. citizen] Alan Beer, and wounded more than 99.” *Beer v. Islamic Republic of Iran*, 574 F. Supp. 2d 1, 6 (D.D.C. 2008) (internal citations omitted). This declaration refers to the attack as the “June 11, 2003 Attack.”

37. The following U.S. citizens were also injured by the attack: Harry Leonard Beer, Anna Beer, Phyllis Maisel, Estelle Carroll, Nathan Pam, Raziel Pam, and Neemah Pam Fisher. *See id.* at 6, 14; *Miller v. Arab Bank, PLC*, 372 F. Supp. 3d 33, 41 (E.D.N.Y. 2019); Complaint at 3-5, *Pam v. Arab Bank*, No. 18-cv-4670 (PKC) (CLP) (E.D.N.Y. Aug. 17, 2018), ECF No. 1;

Ex. 20 (*Patterns of Global Terrorism Report*, U.S. Dep’t of State, Bureau of Counterterrorism and Countering Violent Extremism (2003) at 1 (“Alan Beer and Bertin Joseph Tita were killed on 11 June in a bus bombing near Klal Center on Jaffa Road near Jerusalem.”)).

38. “Abdel-Muti Mohammad Saleh Shabaneh” died perpetrating the June 11, 2003 Attack. *See* Spitzen Decl. ¶ 61.

39. Attached as Exhibit 21 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

40. [REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

[REDACTED]

d. [REDACTED]

[REDACTED]

e. [REDACTED]

[REDACTED]

[REDACTED]

41. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

42. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

43. Attached as Exhibit 22 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

44. [REDACTED]

[REDACTED]

45. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

46. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

47. ***Ramiz Fahmi Izz al-Din Abu Salim.*** On September 9, 2003, U.S. citizens David Applebaum and his daughter Naava Applebaum were killed when a suicide terrorist detonated an explosive device next to the Café Hillel in Jerusalem. *See* Ex. 23 (Declaration of Debra Applebaum dated November 3, 2020, filed in *Sokolow v. Palestine Liberation Org.*, No. 04-cv-00397 (GBD) (S.D.N.Y. Nov. 12, 2020) (ECF No. 1018-24)).

48. Suicide terrorist “Ramiz Fahmi Izz al-Din Abu Salim” died perpetrating the attack. *See* Spitzen Decl. ¶ 61.

49. Attached as Exhibit 24 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

50. [REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

d. [REDACTED]

51. [REDACTED]

52. Attached as Exhibit 25 are true and correct copies of [REDACTED]

53. [REDACTED]

54. [REDACTED]

55. [REDACTED]

[REDACTED]

56. **Abdel Rahman Idris al-Shaludi.** “On the afternoon of October 22, 2014, [a suicide terrorist] . . . drove a car to a light rail station in Jerusalem and intentionally drove onto the light rail tracks and rammed his vehicle into the crowd of pedestrians. *Braun v. Islamic Republic of Iran*, 228 F. Supp. 3d 64, 72 (D.D.C. 2017) (internal quotation omitted). The following U.S. citizens were either killed or injured by the attack: Chaya Zissel Braun, Shmuel Braun, Chana Braun, Esther Braun, Murray Braun. *See id.* at 72-73.

57. “Abdel Rahman Idris al-Shaludi” died perpetrating the attack. *See* Spitzen Decl. ¶ 61.

58. Attached as Exhibit 26 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

59. [REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

d. [REDACTED]

[REDACTED]

[REDACTED]

60. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

61. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

62. Attached as Exhibit 27 are true and correct copies of [REDACTED]

[REDACTED]

63. [REDACTED]

64. [REDACTED]

65. [REDACTED]

66. ***Izz al-Din Shuheil Ahmad al-Masri.*** “On August 9, 2001, an unremarkable day in Jerusalem was rendered tragically memorable when [a suicide terrorist] detonated a ten-pound bomb at a Sbarro restaurant. The resulting explosion killed 15 people” *Roth v. Islamic Republic of Iran*, 78 F. Supp. 3d 379, 387–88 (D.D.C. 2015) (internal citations omitted). This declaration refers to the attack as the “August 9, 2001 Attack.”

67. The following U.S. citizens were either killed or injured by the attack: Malka Chana Roth, Frimet Roth, Elisheva Roth, Pesia Roth, Rivka Roth Rappaport, Zvi Roth, Shaya Roth, Pinchas Roth, Judith Lilian Greenbaum, Steven Greenbaum, Alan Hayman, and Shirlee Hayman. *See id.* at 389-90; *Greenbaum v. Islamic Republic of Iran*, 451 F. Supp. 2d 90, 95-96, 108 (D.D.C. 2006). *See also* Exhibit 28 (*Patterns of Global Terrorism Report*, U.S. Dep’t of

State, Bureau of Counterterrorism and Countering Violent Extremism (2001) at 3 (“On 9 August in Jerusalem, a suicide bomber walked into a busy downtown restaurant and detonated a 10-pound bomb that he was wearing, killing 15 persons and wounding 130 others. Among the fatalities were US citizens Judith Greenbaum and Malka Roth.”).

68. “Izz al-Din Shuheil Ahmad al-Masri” (“Masri”) died perpetrating the August 9, 2001 Attack. *See* Spitzen Decl. ¶ 61.

69. Attached as Exhibit 29 is a true and correct copy of the Declaration of Arnold Roth dated September 4, 2014, filed in *Roth v. Islamic Republic of Iran*, No. 11-cv-01377 (RCL) (D.D.C. Oct. 2, 2014) (ECF No. 34-2) ¶¶ 2-3 (stating that “[a]t the time of her death at age 15, [Malka Roth] was a United States citizen” and her “life ended in a terrorist massacre on August 9, 2001 when a human bomb dispatched by the terrorist organization Hamas exploded in the Sbarro restaurant.”).

70. Attached as Exhibit 30 is a true and correct copy of Malka Roth’s Certification of Birth Abroad of Citizen of the U.S. filed in *Roth v. Islamic Republic of Iran*, No. 11-cv-01377 (RCL) (D.D.C. Oct. 2, 2014) (ECF No. 34-1).

71. Attached as Exhibit 31 is a true and correct copy of the Declaration of Frimet Roth dated September 4, 2014, filed in *Roth v. Islamic Republic of Iran*, No. 11-cv-01377 (RCL) (D.D.C. Oct. 2, 2014) (ECF No. 34-3) ¶¶ 3, 9-12, 16-18 (stating that “I am a citizen of the United States and Israel,” attaching a copy of her U.S. passport, and describing the injuries and harm caused by the death of her daughter Malka Roth in the terrorist attack).

72. Attached as Exhibit 32 is a true and correct copy of the Declaration of Pesia Roth dated September 30, 2014, filed in *Roth v. Islamic Republic of Iran*, No. 11-cv-01377 (RCL) (D.D.C. Oct. 2, 2014) (ECF No. 34-10) ¶¶ 4, 6, 8, 15-16 (stating that “I am a citizen of the

United States and Israel,” attaching a copy of her U.S. passport, and describing the injuries and harm caused by the death of her sister Malka Roth in the terrorist attack).

73. Attached as Exhibit 33 is a true and correct copy of the Declaration of Rivka Roth Rappaport dated September 4, 2014, filed in *Roth v. Islamic Republic of Iran*, No. 11-cv-01377 (RCL) (D.D.C. Oct. 2, 2014) (ECF No. 34-6) ¶¶ 4, 6-8, 16-17 (stating that “I am a citizen of the United States and Israel,” attaching a copy of her U.S. passport, and describing the injuries and harm caused by the death of her sister Malka Roth in the terrorist attack).

74. Attached as Exhibit 34 is a true and correct copy of the Declaration of Zvi Roth dated September 4, 2014, filed in *Roth v. Islamic Republic of Iran*, No. 11-cv-01377 (RCL) (D.D.C. Oct. 2, 2014) (ECF No. 34-7) ¶¶ 4, 6-8, 15-16 (stating that “I am a citizen of the United States and Israel,” attaching a copy of his U.S. passport, and describing the injuries and harm caused by the death of his sister Malka Roth in the terrorist attack).

75. Attached as Exhibit 35 is a true and correct copy of the Declaration of Shaya Roth dated September 4, 2014 filed in *Roth v. Islamic Republic of Iran*, No. 11-cv-01377 (RCL) (D.D.C. Oct. 2, 2014) (ECF No. 34-8) ¶¶ 4, 6-8, 16-17 (stating that “I am a citizen of the United States and Israel,” attaching a copy of his U.S. passport, and describing the injuries and harm caused by the death of his sister Malka Roth in the terrorist attack).

76. Attached as Exhibit 36 is a true and correct copy of the Declaration of Pinchas Roth dated September 4, 2014 filed in *Roth v. Islamic Republic of Iran*, No. 11-cv-01377 (RCL) (D.D.C. Oct. 2, 2014) (ECF No. 34-9) ¶¶ 4, 6, 10-11 (stating that “I am a citizen of the United States and Israel,” attaching a copy of his U.S. passport, and describing the injuries and harm caused by the death of his sister Malka Roth in the terrorist attack).

77. Attached as Exhibit 37 is a true and correct copy of [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

78. [REDACTED]
[REDACTED]

a. [REDACTED]
[REDACTED]
[REDACTED]

b. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

c. [REDACTED]
[REDACTED]

79. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

80. Attached as Exhibit 38 are true and correct copies of [REDACTED]
[REDACTED]

81. [REDACTED]

82. [REDACTED]

83. [REDACTED]

84. [REDACTED]

85. ***Abd El Karim Yassin Bader and Salah a-Din Hassan Salem Jadallah.*** “On October 9, 1994, as Nachshon [Wachsman] waited on the side of the road for a ride to visit a friend, four members of Hamas . . . abducted [Wachsman] from a public street near Lod, Israel.” *Wachsman ex rel. Wachsman v. Islamic Republic of Iran*, 603 F. Supp. 2d 148, 152-53 (D.D.C. 2009). After a standoff with Israeli security forces, three of the perpetrators were killed, after which the forces “found [Wachsman] dead in a back room with his hands and legs bound.” *Id.* at 153.

86. Nachshon Wachsman, his siblings, and his mother were all U.S. citizens. *See id.* at 154-55. *See also* Exhibit 39 (Plaintiffs' Exhibits filed in *Wachsman ex rel. Wachsman v. Islamic Republic of Iran et al.*, No. 06-cv-00351 (RMU) (D.D.C. Nov. 30, 2007) (ECF No. 14-1) (containing passports and proof of U.S. citizenship for Nachshon Wachsman and his family members Esther Wachsman, Menoshe Wachsman, Yitzchak Wachsman, Uriel Wachsman, Raphael Wachsman, Eliahu Wachsman, and Chaim Wachsman).

87. Nachshon Wachsman's family members were injured by the October 9, 1994 attack. *See Wachsman*, 603 F. Supp. 2d at 157-59 (finding that family members Esther Wachsman, Menoshe Wachsman, Yitzchak Wachsman, Uriel Wachsman, Raphael Wachsman, Eliahu Wachsman, and Chaim Wachsman suffered extreme emotional distress as a result of Nachshon Wachsman's death).

88. According to evidence before the court in *Wachsman*, the following perpetrators were killed as security forces attempted to rescue Wachsman: "Salah a-Din Hassan Salem Jadallah"; Hassan Natshe; and "Abd El Karim Yassin Bader" ("Bader"). *See Wachsman*, 603 F. Supp. 2d at 152-53.

89. Attached as Exhibit 40 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

[REDACTED]

90. Attached as Exhibit 41 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

91. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

92. Attached as Exhibit 42 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

93. Attached as Exhibit 43 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

94. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

95. ***Abdel-Basit Mohammed Qasem Odeh.*** On March 27, 2002, a Hamas suicide terrorist detonated a bomb at the Park Hotel in Netanya, killing 29 people and injuring 144. *See Suicide Terrorists in the Current Conflict*, ISRAELI SECURITY AGENCY at 12 (a copy of the relevant sections of the translated report is attached as Exhibit 44); Declaration of Itzhak Ilan 1–3, *Shatsky v. Syrian Arab Republic*, No. 08-cv-0496 (RJL) (D.D.C. Sept. 15, 2020), ECF No. 50-1. This declaration refers to the attack as the “March 27, 2002 Attack.”

96. Among those injured by the March 27, 2002 Attack were U.S. citizens Moshe Naimi and Hannah Rogen. Based on their injuries, the above-named victims brought federal actions under 18 U.S.C. § 2333 and other statutes against Arab Bank, PLC. *See* Second Amended Complaint at 19, *Little v. Arab Bank, PLC*, No. 04-cv-5449 (NG) (VVP) (E.D.N.Y.

Apr. 10, 2007), ECF No. 307; Complaint at 67, *Coulter v. Arab Bank, PLC*, No. 05-cv-0365 (E.D.N.Y. Jan. 21, 2005), ECF No. 1. The complaints, signed by attorneys Mark S. Werbner of Sayles Werbner P.C. and Gary M. Osen of Osen & Associate, LLC, state that the above-named victims were U.S. citizens. *See Little* Second Amended Complaint at 19, 107; *Coulter* Complaint at 67, 109. *See also* Ex. 4 (*Patterns of Global Terrorism Report*, U.S. Dep’t of State, Bureau of Counterterrorism and Countering Violent Extremism (2002) at 1 (“on 27 March, a HAMAS homicide bomber entered the crowded restaurant of a hotel in Netanya, Israel, and detonated a bomb, killing 22 persons, including one US citizen, Hannah Rogen.”)).

97. “Abdel-Basit Mohammed Qasem Odeh” (“Odeh”) died perpetrating the March 27, 2002 attack. *See* Spitzer Decl. ¶ 61.

98. Attached as Exhibit 45 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

99. Attached as Exhibit 46 are true and correct copies of [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

100. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

101. *Abdul Salaam Sadek Mer'y Hassoun*. “On January 17, 2002, at approximately 10:45 p.m., an agent of the PLO and PA arrived at the banquet hall with an M-16 assault rifle, three clips of bullets, and a hand grenade. The agent shot a security guard at the entrance to the hall, and then entered the hall and opened fire on the crowd. There were approximately 180 people present. Six people were killed and approximately thirty were injured.” *Knox v. Palestine Liberation Org.*, 442 F. Supp. 2d 62, 66 (S.D.N.Y. 2006). This declaration refers to the attack as the “January 17, 2002 Attack.”

102. The following U.S. citizens were either killed or injured by the January 17, 2002 Attack: Aharon Ellis, Prince Shaleak, Mellonee Ellis, Jordan Ellis, Francine Ellis, Lynne Ellis, Yihonadav Ellis, Tsaphirah Ellis, Aron Carter, Reuven Carter, Shanon Carter, Shayrah Carter, Amitai Carter, Yoshavyah Carter, and Leslye Knox. *See Knox*, 442 F. Supp. 2d at 81.

103. “Abdul Salaam Sadek Mer'y Hassoun” died perpetrating the January 17, 2002 Attack. *See* Spitzen Decl. ¶ 61.

104. Attached as Exhibit 47 is a true and correct copy of [REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

a. [REDACTED]
[REDACTED]
[REDACTED]
b. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
c. [REDACTED]
[REDACTED]
[REDACTED]
d. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

105. Attached as Exhibit 48 are true and correct copies of [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

106. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

107. *Ala' Khader al-Hreimi*. A U.S. national was killed or injured in an attack on August 16, 2019, according to the U.S. Department of Justice's Office of Justice for Victims of Overseas Terrorism ("OVT"). The OVT investigates such overseas terror attacks and provides services to U.S. citizens or family members of U.S. citizens who suffer direct physical, emotional, or financial harm as a result. 34 U.S.C. §§ 20141(e)(2), 20106; 28 C.F.R. § 94.12(u)(1). The OVT does not release the names of such victims, but it publishes the date and location of confirmed attacks harming U.S. citizens or their family members on its website, and the Dolphinarium attack is on the OVT's list. *See DOJ/OVT Interactive World Map - Near East*, JUSTICE.GOV, <https://www.justice.gov/nsd-ovt/dojovt-interactive-world-map/near-east> (last visited Sept. 21, 2021) (attached as Exhibit 49).

108. "Ala' Khader al-Hreimi" died perpetrating the attack. *See* Spitzen Decl. ¶ 61.

109. Attached as Exhibit 50 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

c. [REDACTED]

110. Attached as Exhibit 51 are true and correct copies of [REDACTED]

111. [REDACTED]

112. ***Alaa Hisham Abu Dheim.*** On March 6, 2008, “a 26-year-old Izz al-Din al-Qassam Brigades operative, entered the Merkaz HaRav Yeshiva in Jerusalem. . . . armed with a Kalashnikov assault rifle with nine compatible magazines, two guns (a Beretta pistol and an FN pistol) with four compatible magazines, and a commando knife.” *Force v. Islamic Republic of Iran*, 464 F. Supp. 3d 323, 354 (D.D.C. 2020) (internal citations omitted). He then opened fire on students in front of the building before entering the building and killing more. *See id.*

113. The following U.S. citizens were either killed or injured by the attack: Avraham David Moses, Rivkah Martha Moses, Naftali Andrew Moses, David Moriah, Elisha Dan Moses, N.M., C.M., O.D.M., A.M., Aviad Moriah, Naftali Shitrit, Gila Rachel Shitrit, Meiri Shitrit, Oshrat Shitrit, N.S., Y.S., A.S., E.S., and H.S. *See Force*, 464 F. Supp. 3d at 355. *See also* Ex. 52 (Declaration of Naftali Moses dated December 24, 2017 filed in *Force v. Islamic Republic of*

Iran, No. 16-cv-01468 (RDM) (D.D.C. Mar. 1, 2018) (ECF No. 66)) (stating “I hold both American and Israeli citizenship. I was born in New York, USA,” describing his son’s (Avraham David Moses) death as a result of the March 6, 2008 attack, and his family’s resulting injuries).

114. “Alaa Hisham Abu Dheim” died perpetrating the attack. *See* Spitzen Decl. ¶ 61.

115. Attached as Exhibit 53 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

116. Attached as Exhibit 54 are true and correct copies of [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

117. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

118. *Ali Ja’ara*. The following U.S. citizens received a judgment in *Sokolow v. Palestine Liberation Org.*, No. 04 CIVIL 00397 (GBD), 2015 WL 10852003 (S.D.N.Y. Oct. 1,

2015), *vacated and remanded sub nom. Waldman v. Palestine Liberation Org.*, 835 F.3d 317 (2d Cir. 2016), under 18 U.S.C. § 2333 for injuries caused by a terrorist attack in Jerusalem on January 29, 2004: Karen Shifra Goldberg, Chana Bracha Goldberg, Esther Zahava Goldberg, Yitzhak Shalom Goldberg, Shoshana Malka Goldberg, Eliezer Simcha Goldberg, Yaakov Moshe Goldberg, and Tzvi Yehoshua Goldberg. *See Sokolow*, 2015 WL 10852003, at *3. This declaration refers to the attack as the “January 29, 2004 Attack.”

119. “Ali Ja’ara” died perpetrating the January 29, 2004 Attack. *See* Spitzen Decl.

¶ 61.

120. Attached as Exhibit 55 is a true and correct copy of [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

121. Attached as Exhibit 56 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

122. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

123. *Anwar Mohammed Atiyyah Sukar and Salah Abd al-Hamid Shaker*

Mohammad. U.S. citizen Gila Afriat-Kurtzer was injured in a suicide bombing at the Beit Lid junction near Netanya on January 22, 1995. *See* Amended Complaint at 13, 15, *Afriat-Kurtzer v. Arab Bank*, No. 05-cv-0388 (BMC) (PK) (E.D.N.Y. Feb. 25, 2005), ECF No. 3; *Almog v. Arab Bank, PLC*, 471 F. Supp. 2d 257, 264 (E.D.N.Y. 2007).

124. According to Westlaw's PeopleMap (the online service providing information about public records), Gila Afriat-Kurtzer was born in 1974 and received a social security number in Maryland in 1985 or 1986. *See* Ex. 57 (copy of PeopleMap report).

125. Two suicide terrorists died perpetrating the attack: "Anwar Mohammed Atiyyah Sukar" and "Salah Abd al-Hamid Shaker Mohammad." *See* Spitzen Decl. ¶ 61.

126. Attached as Exhibit 58 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

127. Attached as Exhibit 59 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

128. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

129. Attached as Exhibit 60 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

130. Attached as Exhibit 61 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

131. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

132. ***Asem Yousef Mohamed Hamed.*** On December 12, 2001, a suicide terrorist detonated a roadside bomb next to the Number 189 bus, causing it to swerve off of the road near Emmanuel. He then opened fire with an automatic assault rifle, killing and injuring many individuals. Among those injured by the attack were U.S. citizens: Benyamin Andrew Pilant, Rebecca Pilant, Samuel Philips Haistings Pilant, Robert Eliot Haistings Pilant, and Elizabeth Anna Haistings Pilant. Based on their injuries, the above-named victims brought a federal action under 28 U.S.C. § 1605A and other statutes against the Islamic Republic of Iran and other parties. *See* Complaint ¶¶ 19, 23–25, *Pilant v. Islamic Republic of Iran*, No. 11-cv-1077 (RMC) (D.D.C. June 9, 2011), ECF No. 3.

133. The *Pilant* complaint, signed by attorneys Gavriel Mairone of MM-Law LLC and Michael Miller of The Miller Firm LLC, states that the above-named victims were U.S. citizens. *See id.* ¶¶ 18, 23-25.

134. “Asem Yousef Mohamed Hamed (a/k/a Assem Yousef Rihan)” died perpetrating the attack. *See* Spitzen Decl. ¶ 61.

135. Attached as Exhibit 62 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

136. Attached as Exhibit 63 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

137. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

138. ***Bahaa Muhammad Khalil Alyan.*** “On the morning of October 13, 2015, two Hamas operatives . . . boarded Egged bus number 78 in the Armon Hanatziv neighborhood of Jerusalem. [One terrorist] was armed with a gun, and [the other] carried a knife. They hid their weapons under their clothing and waited for the bus to pick up other passengers. When the bus became full, [one terrorist] proceeded to the back, where he shot passengers at close range. [The other] used his knife to stab passengers near the front of the bus.” *See Force*, 464 F. Supp. 3d at 346-47 (internal citations omitted). This declaration refers to the attack as the “October 13, 2015 Attack.”

139. The following U.S. citizens were either killed or injured by the October 13, 2015 Attack: Richard Lakin, Micah Lakin Avni, and Manya Lakin. *See id.*

140. “Bahaa Muhammad Khalil Alyan” (“Alyan”) died perpetrating the October 13, 2015 Attack. *See* Spitzen Decl. ¶ 61.

141. Attached as Exhibit 64 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

142. Attached as Exhibit 65 are true and correct copies of [REDACTED]

143. [REDACTED]

144. ***Basem Jamal Darwish al-Takruri.*** On May 18, 2003, a suicide terrorist detonated an explosive device on a bus on French Hill in Jerusalem. *See Suicide Terrorists in the Current Conflict*, ISRAELI SECURITY AGENCY at 6 (a copy of the relevant sections of the translated report is attached as Exhibit 44); Declaration of Itzhak Ilan 1-3, *Shatsky v. Syrian Arab Republic*, No. 08-cv-0496 (RJL) (D.D.C. Sept. 15, 2020), ECF No. 50-1. This declaration refers to the attack as the “May 18, 2003 Attack.”

145. The following U.S. citizens were either killed or injured by the May 18, 2003 Attack: Steven Averbach, Tamir Averbach, Devir Averbach, Sean Averbach, Adam Averbach, David Averbach, Maida Averbach, Michael Averbach, Eileen Sapadin. Based on their injuries, the above-named victims brought a federal action under 18 U.S.C. § 2333 and other statutes against Cairo Amman Bank. *See Amended Complaint at 2-10, Averbach v. Cairo Amman Bank*,

No. 19-cv-00004 (GHW) (KHP) (S.D.N.Y. Apr. 8, 2020), ECF No. 63. The complaint, signed by attorney Ari Ungar of Osen LLC, states that the above-named victims were U.S. citizens. *See id* at 3-10, 169.

146. “Basem Jamal Darwish al-Takruri” died perpetrating the May 18, 2003 Attack.

See Spitzen Decl. ¶ 61.

147. Attached as Exhibit 66 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

[REDACTED]

148. Attached as Exhibit 67 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

149. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

150. *Bashar Muhammad As'ad Sawalha, Yousef Jameel Ahmad Shuli, and Khalil Ibrahim Tawfiq Sharif.* On September 4, 1997, "three Hamas suicide bombers with cases of powerful explosive bombs arrived at the crowded Ben Yehuda Street pedestrian mall in downtown Jerusalem. The bombers packed the bombs with nails, screws, pieces of glass, and chemical poisons to cause maximum pain, suffering, and death." *See Campuzano v. Islamic Republic of Iran*, 281 F. Supp. 2d 258, 261 (D.D.C. 2003) (internal citations omitted).

151. U.S. citizen Yael Botvin was killed in the attack. *See Foreign Operations, Export Financing, and Related Programs Appropriations for Fiscal Year 2000*, S. Comm. On Appropriations, 106th Cong. 58 (1999) at 58 (statement of Mark M. Richard, U.S. Assistant Attorney General), attached as Exhibit 68.

152. The following U.S. citizens were also injured by the attack: Diana Campuzano, Avi Elishis, Gregg Salzman, Jenny Rubin, Daniel Miller, Abraham Mendelson, Stuart Hersh, Noam Rozenman, Deborah Rubin, Renay Frym, Elena Rozenman, Tzvi Rozenman. *See Campuzano*, 281 F. Supp. 2d at 261, 263-68.

153. The following individuals died perpetrating the attack: "Bashar Mohammad As'ad Sawalha," "Yousef Jameel Ahmad Shuli," and "Khalil Ibrahim Tawfiq Sharif." *See* Spitzen Decl. ¶ 61.

154. Attached as Exhibit 69 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

a. [REDACTED]
[REDACTED]
[REDACTED]

b. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

c. [REDACTED]

155. Attached as Exhibit 70 are true and correct copies of [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

156. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

157. Attached as Exhibit 71 is a true and correct copy of [REDACTED]
[REDACTED]
[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

d. [REDACTED]

[REDACTED]

158. Attached as Exhibit 72 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

159. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

160. Attached as Exhibit 73 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

161. Attached as Exhibit 74 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

162. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

163. ***Fadi Ahmad Hamdan Al-Qunbar.*** A U.S. national was killed or injured in an attack in Jerusalem on January 8, 2017, according to the U.S. Department of Justice's OVT. *See DOJ/OVT Interactive World Map - Near East*, Justice.gov, <https://www.justice.gov/nsd>

ovt/dojovt-interactive-world-map/near-east (last visited Sept. 21, 2021), a copy of which is attached as Exhibit 49.

164. “Fadi Ahmad Hamdan Al-Qunbar” died perpetrating the attack. *See* Spitzen Decl. ¶ 61.

165. Attached as Exhibit 75 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

166. Attached as Exhibit 76 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

167. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

168. ***Fadi Attallah Yusuf Amer.*** On March 28, 2001, Americans Netanel, Martin, Yaakov, and Pearl Herskovitz were injured when a suicide bomber “blew himself up outside a gas station near Kfar Sava,” outside Tel Aviv, killing two people and injuring four others. *See* Third Amended Complaint at 68-69, *Strauss v. Crédit Lyonnais, S.A.*, No. 06-cv-0702 (DLI) (RML) (E.D.N.Y. Jan. 28, 2008), ECF No. 127; Order on Motion for Summary Judgment, *Strauss v. Crédit Lyonnais, S.A.*, No. 06-cv-0702 (DLI) (MDG) (E.D.N.Y. Feb. 28, 2013), ECF No. 340 (discussing the Third Amended Complaint).

169. “Fadi Attallah Yusuf Amer” died perpetrating the attack. *See* Spitzen Decl. ¶ 61.

170. Attached as Exhibit 77 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

171. Attached as Exhibit 78 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

172. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

173. ***Muhsin Muhammad Omar al-Qawasmeh and Fadi Ziyad Muhammad Fakhoury.*** On March 7, 2003, U.S. citizens Eli Natan and Debra Ruth Horovitz were murdered in their apartment in Kiryat Arba when terrorists disguised as students infiltrated Kiryat Arba and killed both of them. The following U.S. citizens were also injured by the attack: Moshe Horovitz, Leah Horovitz, Shulamite Horovitz, Batsheva Horovitz, Nechama Horovitz, Tvi Horovitz, Ari Horovitz, David Horovitz, Tovi Horovitz, Uri Horovitz, Bernice Wolf, Stanley Wolf, Brian Wolf. Based on their injuries, the above-named victims brought a federal action under 18 U.S.C. § 2333 and other statutes against Arab Bank, PLC. *See* Second Amended Complaint at 3, 23-27, *Litle v. Arab Bank, PLC*, No. 04-cv-5449 (NG) (VVP) (E.D.N.Y. Apr. 10, 2007), ECF No. 307. The complaint, signed by attorney Mark S. Werbner of Sayles Werbner P.C., states that the above-named victims were U.S. citizens. *See Litle* Second Amended Complaint at 23-27, 107.

174. “Muhsin Muhammad Omar al-Qawasmeh” (“Muhsin Qawasmeh”) and “Fadi Ziyad Muhammad Fakhoury” (“Fakhoury”) died perpetrating the attack. *See* Spitzen Decl. ¶ 61.

175. Attached as Exhibit 79 is a true and correct copy of [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

176. Attached as Exhibit 80 are true and correct copies of [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

177. [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

178. Attached as Exhibit 81 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

[REDACTED]

179. Attached as Exhibit 82 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

180. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

181. ***Uday Abu Jamal and Ghassan Muhammad Ali Abu Jamil.*** On November 18, 2014, two terrorists entered the Kehillat Bnei Torah buildings in the Har Nof neighborhood in Jerusalem with a gun and butcher knives and began attacking worshippers, stabbing them before opening fire. *See Terror Attack in Jerusalem Synagogue*, ISRAEL MINISTRY OF FOREIGN AFFAIRS (Nov. 18, 2014), a copy of which is attached as Exhibit 83.

182. The following U.S. citizens were killed in the attack: Aryeh Kupinsky and Moshe Twersky. Based on their injuries, the above-named victims brought a federal action under 28 U.S.C. § 1605A and other statutes against the Syrian Arab Republic. *See Amended Complaint at 5, 7-9, Heching v. Syrian Arab Republic*, No. 17-cv-1192 (TSC) (D.D.C. July 25, 2017), ECF No. 6. The complaint, signed by attorney Asher Perlin of his eponymous firm, states that the above-named victims were U.S. citizens. *See id.* at 7-9, 37.

183. “Uday Abu Jamal” and “Ghassan Muhammad Abu Jamil” died perpetrating the attack. *See* Spitzen Decl. ¶ 61.

184. Attached as Exhibit 84 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

185. Attached as Exhibit 85 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

186. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

187. Attached as Exhibit 86 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

188. Attached as Exhibit 87 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

189. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

190. ***Hanadi Taysir Abd al-Malik Jaradat.*** On October 4, 2003, U.S. citizen Chaya Ben-Zaken Zilberstein, who was pregnant at the time, was in the Maxim Restaurant in Haifa when a suicide terrorist detonated an explosive device, severely injuring her and killing 21 others. *See Suicide Terrorists in the Current Conflict*, ISRAELI SECURITY AGENCY at 5 (relevant sections of the translated report are attached as Ex. 44); Declaration of Itzhak Ilan 1–3; *Shatsky v. Syrian Arab Republic*, No. 08-cv-0496 (RJL) (D.D.C. Sept. 15, 2020), ECF No. 50-1; Exhibit 88 (Declaration of Clara Ben-Zaken dated November 10, 2020 filed in *Sokolow v. Palestine Liberation Org.*, No. 04-cv-0397 (GBD) (RLE) (S.D.N.Y. Nov. 12, 2020) (ECF. No 1018-25) (stating she and her sister Chaya Ben-Zaken Zilberstein are U.S. citizens, and she was injured by Chaya’s injuries in the attack).

191. Suicide terrorist “Hanadi Taysir Abd al-malik Jaradat” (“Jaradat”) died perpetrating the attack. *See* Spitzen Decl. ¶ 61.

192. Attached as Exhibit 89 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

193. Attached as Exhibit 90 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

194. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

195. ***Jamil Khalaf Mustafa Hamed.*** On March 31, 2002, Netanel Fenichel was driving with his parents in Efrat when a suicide terrorist detonated an explosive device as the car was driving past him. *See Suicide Terrorists in the Current Conflict*, ISRAELI SECURITY AGENCY at 11 (a copy of the relevant sections of the translated report is attached as Exhibit 44); Declaration of Itzhak Ilan 1–3, *Shatsky v. Syrian Arab Republic*, No. 08-cv-0496 (RJL) (D.D.C. Sept. 15, 2020), ECF No. 50-1.

196. As a result of the attack, the following U.S. citizens were injured: Netanel Fenichel, Deborah Fenichel, Ilanit Fenichel, and Moshe Fenichel. Based on their injuries, the above-named victims brought a federal action under 18 U.S.C. § 2333 and other statutes against Arab Bank, PLC. *See* Second Amended Complaint at 3, 15–16, *Little v. Arab Bank, PLC*, No. 04-cv-5449 (NG) (VVP) (E.D.N.Y. Apr. 10, 2007), ECF No. 307. The complaint, signed by attorney Mark S. Werbner of Sayles Werbner P.C., states that the above-named victims were U.S. citizens. *See id.* at 15–16, 107.

197. “Jamil Khalaf Mustafa Hamed” (“Mustafa Hamed”) died perpetrating the attack.

See Spitzen Decl. ¶ 61.

198. Attached as Exhibit 91 is a true and correct copy of [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

a. [REDACTED]

[REDACTED]
[REDACTED]

b. [REDACTED]

[REDACTED]
[REDACTED]

c. [REDACTED]

[REDACTED]

199. Attached as Exhibit 92 are true and correct copies of [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

200. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

201. ***Khaled Mohammad Mahmoud al-Khatib.*** On April 9, 1995, “[a]t or about 12:05 p.m. local time, near Kfar Darom in the Gaza Strip, a suicide bomber drove a van loaded with explosives in the number 36 Egged bus, causing an explosion that destroyed the bus.” *Haim v. Islamic Republic of Iran*, 425 F. Supp. 2d 56, 60 (D.D.C. 2006) (quoting and taking judicial notice of *Flatow v. Islamic Republic of Iran*, 999 F. Supp. 1, 9 ¶ 6 (D.D.C. 1998)).

202. The bombing killed U.S. citizen Alisa Flatow and injured U.S. citizen Seth Klein Ben-Haim. *See Haim*, 425 F. Supp. 2d at 60–61; *Flatow*, 999 F. Supp. 1 at 7. *See also* Exhibit 93 (Affidavit of Seth Charles Klein [Ben Haim] dated May 14, 2004 filed in *Haim v. Islamic Republic of Iran*, No. 02-cv-01811 (RCL) (D.D.C. Jan. 3, 2006) (ECF No. 24-3)) ¶¶ 1, 8-20, 35 (stating “I was born on October 9, 1975 in Miami, Florida,” describing the April 9, 1995 terrorist attack, and his resulting injuries).

203. “Khaled Mohammad Mahmoud al-Khatib” (“al-Khatib”) died perpetrating the attack. *See* Spitzer Decl. ¶ 61.

204. Attached as Exhibit 94 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

205. Attached as Exhibit 95 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

206. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

207. ***Magdi Mohammad Abu Wardah.*** U.S. citizens Matthew Eisenfeld, Sara Duker, and Ira William Weinstein were killed when, on February 25, 1996, a suicide terrorist “detonated explosives which, at the direction of Hamas, he had carried on the bus concealed in a travel bag, resulting in the complete destruction of the bus and hurling debris in excess of 100 meters.”

Eisenfeld v. Islamic Republic of Iran, 172 F. Supp. 2d 1, 4 (D.D.C. 2000), *see Weinstein v. Islamic Republic of Iran*, 184 F. Supp. 2d 13, 15 (D.D.C. 2002). *See also* Exhibit 68 (*Foreign Operations, Export Financing, and Related Programs Appropriations for Fiscal Year 2000*, S.

Comm. On Appropriations, 106th Cong. 58 (1999) at 58 (statement of Mark M. Richard, U.S. Assistant Attorney General) (noting “[t]he terrorist attacks that killed American citizens in Israel” include an attack that killed “Matthew Eisenfeld,” “Sara Duker,” and “Ira Weinstein” on “February 25, 1996”)). This declaration refers to the attack as the “February 25, 1996 Attack.”

208. American Leah Stein Mousa was also injured in the February 25, 1996 Attack.

See Mousa v. Islamic Republic of Iran, 238 F. Supp. 2d 1, 3-5 (D.D.C. 2001).

209. “Magdi Mohammad Abu Wardah” (“Magdi Wardah”) died perpetrating the February 25, 1996 Attack. *See* Spitzen Decl. ¶ 61.

210. Attached as Exhibit 96 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

[REDACTED]

211. Attached as Exhibit 97 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

212. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

213. ***Mahmoud Omran Al-Qawasmeh.*** The following U.S. citizens received a judgment in the United States District Court for the Eastern District of New York under 18 U.S.C. § 2333 for injuries caused by an attack on March 5, 2003 in Haifa: Abigail Little, Philip Little, Heidi Little, Elishua Little, Hannah Little, Josiah Little, Noah Little. *See* Stipulation to Enter Final Judgment, *Linde v. Arab Bank*, No. 06-cv-1623 (BMC) (PK) (E.D.N.Y. May 24, 2016), ECF No. 1098. *See also* Second Amended Complaint at 5-8, *Little v. Arab Bank, PLC*, No. 04-cv-5449 (NG) (VVP) (E.D.N.Y. Apr. 10, 2007), ECF No. 307. This declaration refers to the attack as the “March 5, 2003 Attack.”

214. “Mahmoud Omran Al-Qawasmeh” died perpetrating the March 5, 2003 Attack. *See* Spitzen Decl. ¶ 61.

215. Attached as Exhibit 98 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

[REDACTED]

216. Attached as Exhibit 99 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

217. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

218. ***Mohammed Mashoor Mohammad Hashaika.*** The following U.S. citizens received a judgment under 18 U.S.C. § 2333 stemming from injuries inflicted by an attack on

March 21, 2002 in Jerusalem: Alan J. Bauer, Yehonathon Bauer, Binyamin Bauer, Yehuda Bauer, and Daniel Yichye Bauer. *See Sokolow*, 2015 WL 10852003, at *1-2. This declaration refers to the attack as the “March 21, 2002 Attack.”

219. “Mohammed Mashoor Mohammed Hashaika” died perpetrating the March 21, 2002 Attack. *See* Spitzen Decl. ¶ 61.

220. Attached as Exhibit 100 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

[REDACTED]

221. Attached as Exhibit 101 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

222. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

223. ***Mohammad Naser Mahmoud Tarayreh***. On June 30, 2016, a terrorist broke into a home in Kiryat Arba near Hebron and killed thirteen-year-old Hallal Yaffa Ariel with a knife as she slept. The U.S. Department of Justice's OVT confirmed that a U.S. citizen was a victim of the attack. *See DOJ/OVT Interactive World Map - Near East*, Justice.gov, <https://www.justice.gov/nsd-ovt/dojovt-interactive-world-map/near-east> (last visited Sept. 21, 2021) (attached as Exhibit 49). *See also* Exhibit 102 (*Palestinian kills teen in Israeli settlement, then shot dead*, Reuters (June 30, 2016)) (reporting a Palestinian fatally stabbed a 13-year-old Israeli girl); Exhibit 103 (*Jewish girl, 13, stabbed to death in West Bank bedroom was U.S. citizen*, Fox News (July 6, 2017)) (reporting Hallel Yaffa Ariel, stabbed to death by Mohammed Tarayreh, was a U.S. citizen, as confirmed by U.S. State Department spokesperson).

224. “Mohammad Naser Mahmoud Tarayreh” (“Tarayreh”) died perpetrating the attack. *See* Spitzen Decl. ¶ 61. *See also* Ex. 103.

225. Attached as Exhibit 104 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

226. Attached as Exhibit 105 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

227. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

228. ***Muawiya Mohammad Ahmed Jarara.*** With regard to an attack on July 30, 1997 in Mahane Yehuda Market in Jerusalem, the U.S. District Court for the District of Columbia made the following findings of fact:

On Friday, July 30, 1997, two suicide bombers belonging to the Hamas terrorist organization and acting on behalf of Hamas entered the Mahane Yehuda outdoor produce market in downtown Jerusalem, which was crowded with Sabbath-eve shoppers. Each of the bombers carried a briefcase packed with a powerful explosive charge. At a pre-arranged signal, the bombers triggered their explosives. The blasts ripped through the crowded market, killing 15 shoppers, including decedent Leah Stern, and wounding another 168 (hereinafter “the bombing attack”). In a press release, Hamas claimed responsibility for the bombing attack.

... As a result of the explosion, [U.S. citizen] Leah Stern suffered horrendous injuries. The explosion caused Leah Stern severe burns, and much of the skin on her face was ripped off by the blast. Leah Stern suffered multiple and diffuse lacerations over the

facial area, thorax, abdomen and limbs. Several pieces of shrapnel, specifically nails, lodged in her chin, right breast, right arm, both knees and left thigh. Leah Stern also suffered a gaping abdominal wound which exposed her intestines. Her left leg was covered with burns and lacerations from the explosion, and bones in the lower leg were broken. Leah Stern's right leg was partially severed at the knee, and shrapnel lodged in the remaining portion of her leg.

... Leah Stern expired from her wounds on the scene on July 30, 1997.

Stern v. Islamic Republic of Iran, 271 F. Supp. 2d 286, 289 (D.D.C. 2003) (internal citations omitted). Joseph Stern, Yocheved Kushner, Shimson Stern, and Shaul Stern are Leah Stern's children, are U.S. citizens, and were also injured by the attack. *See id.* at 289-90.

229. "Muawiya Mohammad Ahmed Jarara" died perpetrating the attack. *See* Spitzen Decl. ¶ 61.

230. Attached as Exhibit 106 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

231. Attached as Exhibit 107 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

232. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

233. ***Muhammed Kzid Faysal Bastami***. On October 27, 2002, a suicide terrorist committed an attack near Ariel. As a result of the attack, the following U.S. citizens were injured: Yitzhak Zahavy, Julie Zahavy, Tzvee Zahavy, Bernice Zahavy. *See* Ex. 108 (Declaration of Yitzhak Zahavy dated Nov. 10, 2020 filed in *Sokolow v. Palestine Liberation Org.*, No. 04-cv-00397 (GBD) (S.D.N.Y. Nov. 12, 2020) (ECF No. 1018-23)) (stating he has been “a citizen of the United State since birth,” was “severely injured” in the October 27, 2002 terrorist attack, and that the attack caused severe emotional distress to his family members).

234. “Muhammed Kzid Faysal Bastami” died perpetrating the attack. *See* Spitzen Decl. ¶ 61.

235. Attached as Exhibit 109 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. Bas [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

236. Attached as Exhibit 110 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

237. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

238. ***Nabil Mahmoud Al-Halabiah and Osama Mohammed Bahr.*** On December 1, 2001, a suicide bombing on Ben Yehuda Street in Jerusalem resulted in the deaths of 10 people and injury to 120 others. *See Kirschenbaum v. Islamic Republic of Iran*, 572 F. Supp. 2d 200, 205-06 (D.D.C. 2008).

239. The following U.S. citizens were injured by the attack: Jason Kirschenbaum, Isabelle Kirschenbaum, Martin Kirschenbaum, Joshua Kirschenbaum, David Kirschenbaum, and Danielle Teitlebaum. *See Kirschenbaum*, 572 F. Supp. 2d at 204-05. *See also* Ex. 111 (Affidavit of Martin Kirschenbaum dated March 6, 2008 filed in *Kirschenbaum v. Islamic Republic of Iran*, No. 03-cv-01708 (RCL) (D.D.C. Mar. 13, 2008) (ECF No. 29-1)) (stating “I became a citizen of the United States on December 17, 1962” and attaching Certificate of Naturalization).

240. Additional individuals filed an action under 18 U.S.C. § 2333 as U.S. nationals injured by this attack. *See Strauss v. Crédit Lyonnais, S.A.*, 925 F. Supp. 2d 414, 418 (E.D.N.Y. 2013); Complaint ¶¶ 308-359, *Strauss*, 925 F. Supp. 2d 414, No. 1:06-cv-00702-DLI-RML (E.D.N.Y. Feb. 16, 2006), ECF No. 1.

241. Two suicide terrorists died perpetrating the attack: “Nabil Mahmoud Al-Halabiah” and “Osama Mohammed Bahr.” *See* Spitzen Decl. ¶ 61.

242. Attached as Exhibit 112 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

243. Attached as Exhibit 113 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

244. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

245. Attached as Exhibit 114 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

246. Attached as Exhibit 115 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

247. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

248. ***Omar Muhammad Awadh Abu al-Rab and Yousef Muhammad Ragheb Abu al-Rab.*** On November 28, 2002, two Al-Aqsa Martyrs Brigade terrorists entered a polling station in Beit Shean, killing six and wounding more than 20, including Jacky Levi, the husband of U.S. citizen Bat Zion Levi. Based on her injuries, Bat Zion Levi brought a federal action under 18 U.S.C. § 2333 and other statutes against Chevron Corporation and other defendants. *See* Second Amended Complaint at 17, 19, *Almog v. Arab Bank, PLC*, No. 04-cv-5564 (BMC) (PK) (E.D.N.Y. Apr. 20, 2015), ECF No. 1250. The complaint, signed by attorney John M. Eubanks of Motley Rice LLC, states that Levi was a U.S. citizen. *See id.* at 17, 20.

249. “Omar Muhammad Awadh Abu al-Rab” and “Yousef Muhammad Ragheb Abu al-Rab” died perpetrating the attack. *See* Spitzen Decl. ¶ 61.

250. Attached as Exhibit 116 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

251. Attached as Exhibit 117 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

252. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

253. Attached as Exhibit 118 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

254. Attached as Exhibit 119 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

255. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

256. ***Osama Adel Mohammad Beshkar.*** On May 19, 2002, U.S. citizen Gloria Kushner was injured in a market in Netanya when a suicide terrorist blew himself up, killing 3 and injuring 60. *See Suicide Terrorists in the Current Conflict*, ISRAELI SECURITY AGENCY at 9 (a copy of the relevant sections of the translated report is attached as Exhibit 44); Declaration of

Itzhak Ilan 1–3, *Shatsky v. Syrian Arab Republic*, No. 08-cv-0496 (RJL) (D.D.C. Sept. 15, 2020), ECF No. 50-1.

257. Based on her injuries, Kushner brought a federal action under 18 U.S.C. § 2333 and other statutes against Arab Bank, PLC. *See* First Amended Complaint, *Linde v. Arab Bank, PLC*, No. 04-cv-2799 (NG) (ASC) (E.D.N.Y. Aug. 10, 2004), ECF No. 4. The complaint, signed by attorney David H. Wollmuth of Wollmuth Maher & Deutsch LLP, states that Kushner was a U.S. citizen. *See id.* at 28, 67.

258. “Osama Adel Mohammad Beshkar” died perpetrating the attack. *See* Spitzen Decl. ¶ 61.

259. Attached as Exhibit 120 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

d.

260. Attached as Exhibit 121 are true and correct copies of

261.

262. *Raed Abdel-Hamid al-Razaq Misk*. With regard to the attack in Jerusalem on

August 19, 2003, the U.S. District Court for the District of Columbia made the following

findings of fact:

On August 19, 2003, Ora Cohen and her then-husband Shalom journeyed to the Western Wall, a holy site in Old Jerusalem, for an afternoon of prayer. Their five children—daughter Meirav Cohen (7 years old at the time); son Daniel Cohen (6 years old); daughter Orly Cohen (4 years old); daughter Shira Cohen (1 year old); and newborn son, Elchanan Cohen (1 month old)—accompanied them on this family outing. That evening, the Cohen family boarded the Number 2 Egged Bus to return home. Because the bus was crowded, the family was forced to split up in order to find seating, with Shalom and Shira standing in the middle of the bus apart from the rest of the family, who were seated near the front. A few stops short of their final destination, Ora observed a gentleman force his way onto the bus and remembers the “whole world [going] black.”

[A] Hamas operative [] had boarded the bus in the Shmuel Ha–Navi neighborhood with a bomb strapped to his body. He detonated it almost immediately upon boarding, killing 23 people and injuring 130 more, including every Cohen family member aboard.

Cohen v. Islamic Republic of Iran, 238 F. Supp. 3d 71, 75–76 (D.D.C. 2017) (internal citations omitted). This declaration refers to the attack as the “August 19, 2003 Attack.”

263. Ora Cohen and all of her children are U.S. citizens. *See id.* at 77. *See also* Ex. 122 (Affidavit of Ora Cohen dated August 18, 2016 filed in *Cohen v. Islamic Republic of Iran*, No. 12-cv-01496 (CRC) (D.D.C. Aug. 22, 2016) (ECF No. 39-1)) ¶¶ 2-11 (stating Ora Cohen, along with her children Mirav, Daniel, Orly, Shira, and Elchanan are U.S. citizens and suffered injuries as a result of the August 19, 2003 attack, and attaching proof of citizenship).

264. U.S. citizen Shalom Goldstein was also injured in the August 19, 2003 Attack. *See* Ex. 123 (Declaration of Shalom Goldstein dated December 2, 2018 filed in *Goldstein v. Islamic Republic of Iran*, No. 16-cv-2507 (D.D.C. Dec. 3, 2018) (ECF No. 15-1)) ¶¶ 2-4.

265. “Raed Abdel-Hamid al-Razaq Misk” died perpetrating the August 19, 2003 Attack. *See* Spitzen Decl. ¶ 61.

266. Attached as Exhibit 124 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

[REDACTED]

267. Attached as Exhibit 125 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

268. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

269. ***Ramez Abed al-Kader Mohammad Abid.*** On March 4, 1996 in Tel Aviv, Gail Belkin, the wife of U.S. citizen Lawrence Belkin, was killed when “a suicide bomber affiliated with the Shaqaqi faction of the Palestine Islamic Jihad (“PIJ”) detonated a 40-pound bomb that he was carrying just outside the doors of [a] shopping mall . . . [killing] Gail Belkin and her mother, plus eleven others, mostly women and children” and injuring 125 others. *Belkin v. Islamic Republic of Iran*, 667 F. Supp. 2d 8, 12-13 (D.D.C. 2009).

270. “Ramez Abed al-Kader Mohammad Abid” died perpetrating the attack. See Spitzen Decl. ¶ 61.

271. Attached as Exhibit 126 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

272. Attached as Exhibit 127 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

273. [REDACTED]

[REDACTED]

[REDACTED]

274. ***Said Hussein Hasan Hutari.*** On June 1, 2001, a Hamas operative and suicide terrorist detonated himself near a group of people at the entrance to the “Water World” club in the Tel Aviv Dolphinarium, killing 22 and injuring 83 others. *See Suicide Terrorists in the Current Conflict*, ISRAELI SECURITY AGENCY at 15 (a copy of the relevant sections of the translated report is attached as Ex. 44); Declaration of Itzhak Ilan 1–3, *Shatsky v. Syrian Arab Republic*, No. 08-cv-0496 (RJL) (D.D.C. Sept. 15, 2020), ECF No. 50-1. This declaration refers to the attack as the “June 1, 2001 Attack.”

275. A U.S. national was killed or injured in the June 1, 2001 Attack, according to the U.S. Department of Justice's OVT. *See DOJ/OVT Interactive World Map - Near East*, Justice.gov, <https://www.justice.gov/nsd-ovt/dojovt-interactive-world-map/near-east> (last visited Sept. 21, 2021) a copy of which is attached as Exhibit 49.

276. "Said Hussein Hasan Hutari" died perpetrating the June 1, 2001 Attack. *See* Spitzen Decl. ¶ 61.

277. Attached as Exhibit 128 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

[REDACTED]

278. Attached as Exhibit 129 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

279. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

280. ***Said Ibrahim Said Ramadan.*** The following U.S. citizens received a judgment under 18 U.S.C. § 2333 stemming from injuries inflicted by an attack on January 22, 2002 in Jerusalem (Jaffa Road): Shayna Gould, Ronald Gould, Elise Gould, Jessica Gould Rine, Shmuel Waldman, Henna Waldman, Morris Waldman. *See Sokolow*, 2015 WL 10852003, at *1. This declaration refers to the attack as the “January 22, 2002 Attack.”

281. “Said Ibrahim Said Ramadan” (“Ramadan”) died perpetrating the January 22, 2002 Attack. *See* Spitzen Decl. ¶ 61.

282. Attached as Exhibit 130 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

d. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

283. Attached as Exhibit 131 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

284. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

285. ***Sa'id Wadah Hamid Awada.*** U.S. citizen Leonard Mandelkorn received a judgment in a case under 18 U.S.C. § 2333 stemming from injuries caused by an attack in Jerusalem on June 19, 2002. *See Sokolow*, 2015 WL 10852003, at *2.

286. “Sa’id Wadah Hamid Awada” was killed while perpetrating the attack. *See* Spitzen Decl. ¶ 61.

287. Attached as Exhibit 132 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

[REDACTED]

288. Attached as Exhibit 133 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

289. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

290. ***Samir Samih Mohammad Hammad.*** “[D]uring lunchtime on April 17, 2006, a suicide bomber arrived at the Rosh Ha’ir restaurant in Tel Aviv carrying a powerful explosive device which had been provided to him by the [Palestinian Islamic Jihad]. The explosion killed eleven people and wounded dozens of others. Among the wounded w[as] sixteen-year-old [U.S.]

citizen] Daniel Wultz.” *Wultz v. Islamic Republic of Iran*, 864 F. Supp. 2d 24, 30, 32 (D.D.C. 2012) (internal citations omitted). This declaration refers to the attack as the “April 17, 2006 Attack.”

291. The following U.S. citizens were also injured by the April 17, 2006 Attack: Yekutiel Wultz, Sheryl Wultz, and Amanda Wultz. *Id.* at 32. Daniel died of his injuries. *Id.* at 27.

292. “Samer Samih Mohammad Hammad” (“Samer Samih”) died perpetrating the April 17, 2006 Attack. *See* Spitzen Decl. ¶ 61.

293. Attached as Exhibit 134 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

[REDACTED]

294. Attached as Exhibit 135 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

295. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

296. ***Sufyan Salem Abd Rabbo al-Jabarin.*** A suicide bombing killed U.S. citizen Joanne Davenny on August 21, 1995, according to Department of Justice testimony reporting on an FBI investigation into her death. *See Exhibit 68 (Foreign Operations, Export Financing, and Related Programs Appropriations for Fiscal Year 2000, S. Comm. on Appropriations, 106th Cong. 58 (1999) at 58 (statement of Mark M. Richard, U.S. Assistant Attorney General)).*

297. “Sufyan Salem Abd Rabbo al-Jabarin” (“Jabarin”) died perpetrating the attack. *See* Spitzen Decl. ¶ 61.

298. Attached as Exhibit 136 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

c. Ja [REDACTED]

[REDACTED]

299. Attached as Exhibit 137 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

300. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

301. ***Yusef Ibrahim Hasan Atalla.*** On August 31, 2002, U.S. citizens Jacob and Dalit Rand were walking from synagogue in Har Bracha near Nablus when a suicide terrorist opened fire at them, seriously injuring both. Based on their injuries, these victims brought a federal action under 18 U.S.C. § 2333 and other statutes against Arab Bank, PLC. *See* Second Amended Complaint, *Litle v. Arab Bank, PLC*, No. 04-cv-5449 (NG) (VVP) (E.D.N.Y. Apr. 10, 2007), ECF No. 307. The complaint, signed by attorney Mark S. Werbner of Sayles Werbner P.C., states that the above-named victims were U.S. citizens. *See id.* at 3, 60, 107.

302. “Yusef Ibrahim Hasan Atalla” (“Hasan Atalla”) died perpetrating the attack. *See* Spitzen Decl. ¶ 61.

303. Attached as Exhibit 138 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

[REDACTED]

d. [REDACTED]

[REDACTED]

[REDACTED]

304. Attached as Exhibit 139 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

305. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

306. **Zaynab Ali Isa Abu Salem.** On September 22, 2004, a suicide terrorist detonated an explosive device near the French Hill section of Jerusalem, killing two and wounding 17 others, including U.S. citizen Michael Spitz. *See Miller v. Arab Bank, PLC*, 372 F. Supp. 3d 33, 41 (E.D.N.Y. 2019); Complaint at 11, *Pam v. Arab Bank*, No. 18-cv-4670 (PKC) (CLP) (E.D.N.Y. Aug. 17, 2018), ECF No. 1.

307. “Zaynab Ali Isa Abu Salem” died perpetrating the attack. *See* Spitzen Decl. ¶ 61.

308. Attached as Exhibit 140 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

d. [REDACTED]

[REDACTED]

[REDACTED]

e. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

309. Attached as Exhibit 141 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

310. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Defendants' Payments to Designees of Individuals by Reason of Their Imprisonment for Acts of Terrorism That Injured or Killed U.S. Nationals.

311. Attached as Exhibit 142 is a true and correct copy of excerpts of the transcript of the deposition of Abdel Jabbar Salem, held on July 27, 2021 and July 28, 2021. [REDACTED]

[REDACTED]

312. [REDACTED]

[REDACTED]

[REDACTED]

313. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

314. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

315. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

316. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

317. [REDACTED]

[REDACTED]

[REDACTED]

318. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

319. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

320. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

321. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

322. ***Mohammed Atiya Mahmoud Abu Warda.*** “Mohammed Atiya Mahmoud Abu Warda” (“Abu Warda”) pled guilty for his role in perpetrating the February 25, 1996 Attack, in

which three U.S. citizens were killed and one was injured (see ¶¶ 207-208, *supra*). *See* Kaufman Decl. ¶ 7.

323. Attached as Exhibit 143 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

324. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

325. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

326. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

327. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

328. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

329. [REDACTED]

[REDACTED]

[REDACTED]

330. [REDACTED]

[REDACTED]

[REDACTED]

331. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

332. Attached as Exhibit 144 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

333. [REDACTED]

[REDACTED]

[REDACTED]

334. ***Hussam Abdul-Kader Ahmad Halabi.*** “On March 24, 2002, terrorists with machine guns attacked a public bus near Neve Tzuf, an Israeli settlement in the West Bank. Esther Klieman, an American schoolteacher, was shot and killed. In the aftermath, Al Aqsa Martyrs Brigade, an organization designated as a Foreign Terrorist Organization by the U.S. Department of State, claimed responsibility for the attack.” *See Estate of Klieman v. Palestinian Auth.*, 82 F. Supp. 3d 237, 240 (D.D.C. 2015), *aff’d sub nom. Estate of Klieman ex rel. Kesner v. Palestinian Auth.*, 923 F.3d 1115 (D.C. Cir. 2019), *cert. granted, judgment vacated*, 140 S. Ct. 2713 (2020), *and opinion reinstated in part*, No. 15-7034, 2020 WL 5361653 (D.C. Cir. Aug. 18, 2020). This declaration refers to the attack as the “March 24, 2002 Attack.”

335. “Hussam Abdul-Kader Ahmad Halabi” (“Halabi”) pleaded guilty to his role in perpetrating the March 24, 2002 Attack. *See Kaufman Decl.* ¶ 7.

336. Attached as Exhibit 145 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

337. [REDACTED]

[REDACTED]

338. [REDACTED]

339. [REDACTED]

340. Attached as Exhibit 146 is a true and correct copy of [REDACTED]

341. [REDACTED]

342. [REDACTED]

343. ***Mohammed Abdel-Basset al-Haroub.*** On November 19, 2015, U.S. citizens Ezra Schwartz, Michael Benzakein, and Jason Geller were riding in a van to deliver care packages to Israeli soldiers and beautify a park in honor of three Israeli boys who had been kidnapped and murdered in 2014. When the van was stopped at a busy intersection in Gush Etzion, a terrorist affiliated with Hamas opened fire into the traffic with an automatic

submachine gun, killing Schwartz and injuring Benzakein and Geller. *See DOJ/OVT Interactive World Map - Near East*, Justice.gov, <https://www.justice.gov/nsdovt/dojovt-interactive-world-map/near-east> (last visited Sept. 21, 2021) (attached as Exhibit 49). *See also* Exhibit 147 (Declaration of Ruth Schwartz dated October 13, 2019 filed in *Schwartz v. Islamic Republic of Iran*, No. 18-cv-1349 (D.D.C. Oct. 17, 2019) (ECF No. 28-1) (stating she and her son Ezra Schwartz were U.S. citizens and describing Ezra's death and resulting injuries); Exhibit 148 (Declaration of Michael Benzakein dated October 16, 2019 filed in *Schwartz v. Islamic Republic of Iran*, No. 18-cv-1349 (D.D.C. Oct. 17, 2019) (ECF No. 28-6) (stating he was born in New York on July 10, 1997 and describing injuries as a result of the attack); Exhibit 149 (Declaration of Jason Geller dated October 16, 2019 filed in *Schwartz v. Islamic Republic of Iran*, No. 18-cv-1349 (D.D.C. Oct. 17, 2019) (ECF No. 28-12) (stating he was born in Long Island, New York on October 14, 1997 and describing injuries as a result of the attack).

344. “Mohammed Abdel Basset al-Haroub” pled guilty for his role in perpetrating the attack. *See* Kaufman Decl. ¶ 7.

345. Attached as Exhibit 150 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

346. [REDACTED]

[REDACTED]

[REDACTED]

347. [REDACTED]

[REDACTED]

[REDACTED]

348. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

349. [REDACTED]

[REDACTED]

[REDACTED]

350. [REDACTED]

[REDACTED]

351. Attached as Exhibit 151 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

352. [REDACTED]

[REDACTED]

[REDACTED]

353. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

354. ***Yahia Muhamad Naif Abdullah Hajj Hamad.*** On October 1, 2015, U.S. citizen Eitam Henkin was driving past the town of Beit Furik with his wife and family when members of Hamas overtook the car and shot Eitam Henkin and his wife in front of their children. *See Ex. 152* (Declaration of Judah Herzl Henkin dated August 19, 2020, filed in *Henkin v. Islamic Republic of Iran*, No. 1:18-cv-01273-RCL (D.D.C. Aug. 27, 2020) (ECF No. 21-4). *See also* Kaufman Decl. at ¶ 11 (discussing court documents that note Eitan Henkin as a victim in this attack). This declaration refers to the attack as the “October 1, 2015 Attack.”

355. “Yahia Muhamad Naif Abdullah Hajj Hamad” (“Hajj Hamad”) was convicted for his role in perpetrating the October 1, 2015 Attack. *See* Kaufman Decl. ¶ 8.

356. Attached as Exhibit 153 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

357. [REDACTED]

[REDACTED]

[REDACTED]

358. [REDACTED]

[REDACTED]

359. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

360. Attached as Exhibit 154 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

361. [REDACTED]

[REDACTED]

[REDACTED]

362. [REDACTED]

[REDACTED]

[REDACTED]

363. ***Alaa Raed Salah Zajayer.*** On July 1, 2016, Rabbi Michael Mark and his wife, U.S. citizen Chava Mark were driving with their children in the South Hebron Hills when a terrorist affiliated with Hamas drove up next to them and opened fire with an automatic rifle, killing Michael Mark and severely injuring Chava Mark and their two children (Tehilla and Pedaya). Based on their injuries, the Mark family brought a federal action under 28 U.S.C. § 1605A and other statutes against the Islamic Republic of Iran. *See Complaint, Mark v. Islamic Republic of Iran*, No. 20-cv-00651-TNM (D.D.C. March 5, 2020), ECF No. 1. The complaint, signed by attorneys Paul G. Gaston and Asher Perlin, details the attacks and states that Michael and Chava and their two children were U.S. citizens. *See id.* at 3, 7–14, 22–23. *See also* Exhibit

155 (copy of Pedaya Mark Certificate of U.S. Citizenship); Exhibit 156 (copy of Tehilla Mark Certificate of U.S. Citizenship); Exhibit 157 (copy of Chava Mark passport, date of issue June 23, 2010). This declaration refers to the attack as the “July 1, 2016 Attack.”

364. “Alaa Raed Salah Zajayer” was convicted for his role in perpetrating the attack.

See Kaufman Decl. ¶ 8.

365. Attached as Exhibit 158 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

366. [REDACTED]

[REDACTED]

[REDACTED]

367. [REDACTED]

[REDACTED]

[REDACTED]

368. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

369. [REDACTED]

[REDACTED]

370. [REDACTED]

[REDACTED]

[REDACTED]

371. Attached as Exhibit 159 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

372. [REDACTED]

[REDACTED]

[REDACTED]

373. [REDACTED]

[REDACTED]

374. **Ahmed Salah.** “Ahmed Salah” was convicted for his role in perpetrating the January 29, 2004 Attack that injured eight U.S. citizens (*see ¶ 118, supra*). *See* Kaufman Decl. ¶ 8.

375. Attached as Exhibit 160 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

376. Attached as Exhibit 161 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

377. [REDACTED]

[REDACTED]

[REDACTED]

378. ***Amjad Adel Muhamad Aliwi.*** “Amjad Adel Muhamad Aliwi” (“Aliwi”) was convicted for his role in perpetrating the October 1, 2015 Attack in which a U.S. citizen was shot (see ¶ 354, *supra*). See Kaufman Decl. ¶ 8.

379. Attached as Exhibit 162 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

d. [REDACTED]

[REDACTED]

380. Attached as Exhibit 163 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

381. [REDACTED]

[REDACTED]

[REDACTED]

382. **Balal Abu-Ga'aanem.** “Balal Abu-Ga'aanem” was convicted for his role in perpetrating the October 13, 2015 Attack that killed and/or injured three U.S. citizens (see ¶¶ 138-139, *supra*). *See* Kaufman Decl. ¶ 8.

383. Attached as Exhibit 164 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

d. [REDACTED]

[REDACTED]

384. Attached as Exhibit 165 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

385. [REDACTED]

[REDACTED]

[REDACTED]

386. **Hilmi Hamash.** “Hilmi Hamash” was convicted for his role in perpetrating the January 29, 2004 Attack that injured eight U.S. citizens (*see ¶ 118, supra*). *See* Kaufman Decl. ¶ 8.

387. Attached as Exhibit 166 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

d. [REDACTED]

[REDACTED]

388. Attached as Exhibit 167 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

389. [REDACTED]

[REDACTED]

[REDACTED]

390. ***Hussam al-Qawasmeh.*** On Thursday, June 12, 2014, sixteen-year-old U.S. citizen Naftali Fraenkel and two classmates were kidnapped by perpetrators affiliated with Hamas. *See Fraenkel v. Islamic Republic of Iran*, 892 F.3d 348, 351 (D.C. Cir. 2018). Their bodies were located after an 18-day search. *See id.* at 352.

391. “Hussam al-Qawasmeh” was convicted for his role in perpetrating the attack. *See* Kaufman Decl. ¶ 8.

392. Attached as Exhibit 168 is a true and correct copy of

393. Attached as Exhibit 169 is a true and correct copy of

For more information, contact the Office of the Vice President for Research and the Office of the Vice President for Student Affairs.

394. [REDACTED]

[REDACTED]

395. ***Ibrahim Jamil Abd al-Ghani Hamed.*** The following U.S. citizens received a judgment under 18 U.S.C. § 2333 caused by injuries inflicted by an attack at Hebrew University in Jerusalem on July 31, 2002: Katherine Baker, Benjamin Blutstein (estate of), Rebekah Blutstein, Richard Blutstein, Diane Carter (estate of), Larry Carter, Shaun Coffel, Robert L. Coulter, Jr., Diane Coulter Miller, Robert L. Coulter, Sr., Janis Ruth Coulter (estate of), Norman Gritz (estate of), David Gritz (estate of), and Nevenka Gritz. *See Sokolow v. Palestine Liberation Org.*, No. 04-cv-0397 (GBD), 2015 WL 10852003, at *2–3 (S.D.N.Y. Oct. 1, 2015). *See also* Exhibit 4 (*Patterns of Global Terrorism Report*, U.S. Dep’t of State, Bureau of Counterterrorism and Countering Violent Extremism (2002)) at 2 (“On 31 July a bomb planted by HAMAS terrorists exploded at Hebrew University in Jerusalem, killing nine persons and wounding 87 others. Among the dead were five US citizens—Benjamin Blutstein, Marla Bennet, Diane Leslie Carter, Janis Ruth Coulter, and David Gritz.”). This declaration refers to the attack as the “July 31, 2002 Attack.”

396. “Ibrahim Jamil Abd al-Ghani Hamed” was convicted for his role in perpetrating the July 31, 2002 Attack. *See* Kaufman Decl. ¶ 8.

397. Attached as Exhibit 170 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

d. [REDACTED]

[REDACTED]

[REDACTED]

398. Attached as Exhibit 171 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

399. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

400. *Ayad Fatafta*. On December 18, 2010, two Palestinian terrorists abducted U.S. citizen Kristine Luken and another woman, before repeatedly stabbing them, killing Luken and severely injuring the other. *See* Ex. 172 (Affidavit of FBI Special Agent Nicole Mercer in Support of an Arrest Warrant and a Criminal Complaint dated April 13, 2017, *United States v. Fatafta*, No. 17-mj-229 (D.D.C. Apr. 13, 2017)) at 2-5.

401. “Ayad Fatafta” was convicted for his role in perpetrating the attack. *See* Kaufman Decl. ¶ 8.

402. Attached as Exhibit 173 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

d. [REDACTED]

[REDACTED]

403. Attached as Exhibit 174 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

404. [REDACTED]

[REDACTED]

[REDACTED]

405. ***Izz al-din Halid Hussain al-Hamamra.*** On February 22, 2004, U.S. citizen Rebecca Nevies was riding the No. 14 bus in Jerusalem when a suicide terrorist detonated an explosive device, killing 8 and injuring 60 others, including Nevies. *See Suicide Terrorists in the Current Conflict*, ISRAELI SECURITY AGENCY at 4 (a copy of the relevant sections of the translated report is attached as Exhibit 44); Declaration of Itzhak Ilan 1–3, *Shatsky v. Syrian Arab Republic*, No. 08-cv-0496 (RJL) (D.D.C. Sept. 15, 2020), ECF No. 50-1.

406. Based on her injuries, Nevies brought a federal action under 18 U.S.C. § 2333 and other statutes against Arab Bank, PLC. *See* Second Amended Complaint, *Little v. Arab Bank, PLC*, No. 04-cv-5449 (NG) (VVP) (E.D.N.Y. Apr. 10, 2007), ECF No. 307. The complaint, signed by attorney Mark S. Werbner of Sayles Werbner P.C., states that Nevies was a U.S. citizen. *See id.* at 19, 107.

407. “Izz al-din Halid Hussain al-Hamamra” (“Hamamra”) was convicted for his role in perpetrating the attack. *See* Kaufman Decl. ¶ 8.

408. Attached as Exhibit 175 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

d. [REDACTED]

[REDACTED]

409. Attached as Exhibit 176 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

410. [REDACTED]

[REDACTED]

[REDACTED]

411. ***Mahmud Hamad Mahmud Sharitah.*** “On September 19, 2002, shortly before 12:55 p.m., [a suicide terrorist] boarded a number 4 bus near 94 Allenby Street in Tel Aviv. Just as the bus began to move, [the suicide terrorist] activated an explosive device that he was wearing,” killing six and injuring 84 others. *See Sisso v. Islamic Republic of Iran*, No. CIV.A. 05-0394 (JDB), 2007 WL 2007582, at *2 (D.D.C. July 5, 2007) (internal citation omitted). One of those killed was Rozana Sisso, the mother of U.S. citizen Avraham Sisso. *See id.* at *1–2.

412. “Mahmud Hamad Mahmud Sharitah” (“Sharitah”) pled guilty for his role in perpetrating the attack. *See Kaufman Decl.* ¶ 7.

413. Attached as Exhibit 177 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]
[REDACTED]
[REDACTED]
b. [REDACTED]
[REDACTED]
[REDACTED]
c. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
d. [REDACTED]
[REDACTED]

414. Attached as Exhibit 178 is a true and correct copy of [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

415. [REDACTED]
[REDACTED]
[REDACTED]

416. ***Mohamed Sami Ibrahim Abdullah.*** “Mohamed Sami Ibrahim Abdullah”

(“Ibrahim Abdullah”) pleaded guilty for his role in perpetrating the January 22, 2002 Attack that injured seven U.S. citizens (*see ¶ 280, supra*). *See* Kaufman Decl. ¶ 7.

417. Attached as Exhibit 179 is a true and correct copy of

A series of six horizontal black bars of varying lengths, decreasing from top to bottom. The bars are evenly spaced and extend across the width of the frame.

a. 

b. [REDACTED]

[REDACTED]

[REDACTED]

c.

418. Attached as Exhibit 180 is a true and correct copy of

[REDACTED]

[REDACTED]

[REDACTED]

419. [REDACTED]

[REDACTED]

[REDACTED]

420. *Munir Rajbi*. “Munir Rajbi” pleaded guilty for his role in perpetrating the March 5, 2003 Attack that injured seven U.S. citizens (see ¶ 213, *supra*). *See* Kaufman Decl. ¶ 7.

421. Attached as Exhibit 181 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

d. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

e. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

422. Attached as Exhibit 182 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

423. [REDACTED]

[REDACTED]

[REDACTED]

424. ***Nasim Rashad Abd el-Wadud Za'tari.*** “Nasim Rashad Abd el-Wadud Za’tari” pleaded guilty for his role in perpetrating the August 19, 2003 Attack that injured seven U.S. citizens (see ¶¶ 262-264, *supra*). *See* Kaufman Decl. ¶ 7.

425. Attached as Exhibit 183 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

426. Attached as Exhibit 184 is a true and correct copy of

427. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

428. ***Samir Zahir Ibrahim Kusa.*** “Samir Zahir Ibrahim Kusa” was convicted for his role in perpetrating the October 1, 2015 Attack in which a U.S. citizen was shot (see ¶ 354, *supra*). See Kaufman Decl. ¶ 8.

429. Attached as Exhibit 185 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

430. Attached as Exhibit 186 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

431. Kusa [REDACTED]

[REDACTED]

[REDACTED]

432. ***Suhib Jabara Ahmed Alfakiyah.*** “Suhib Jabara Ahmed Alfakiyah” was convicted for his role in perpetrating the July 1, 2016 Attack that killed or injured four U.S. citizens (see ¶ 363, *supra*). See Kaufman Decl. ¶ 8.

433. Attached as Exhibit 187 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

[REDACTED]

d. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

e. [REDACTED]

[REDACTED]

434. Attached as Exhibit 188 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

435. [REDACTED]

[REDACTED]

[REDACTED]

436. ***Munzar Mahmoud Khalil Noor.*** The following U.S. citizens received a judgment in *Sokolow v. Palestine Liberation Org.*, No. 04-cv-0397 (GBD), 2015 WL 10852003 (S.D.N.Y. Oct. 1, 2015) under 18 U.S.C. § 2333 stemming from injuries inflicted by an attack on January 27, 2002 in Jerusalem: Mark Sokolow, Elana Sokolow, Jamie Sokolow, Lauren Sokolow, Rena Sokolow. *See Sokolow*, 2015 WL 10852003 at *1.

437. “Munzar Mahmoud Khalil Noor” (“Noor”) was convicted for his role in perpetrating the attack. *See Kaufman Decl.* ¶ 8.

438. Attached as Exhibit 189 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

[REDACTED]

439. Attached as Exhibit 190 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

440. [REDACTED]

[REDACTED]

[REDACTED]

441. ***Akram Ibrahim Mahmoud Qawasme***. “Akram Ibrahim Mahmoud Qawasme” pleaded guilty for his role in perpetrating the February 25, 1996 Attack in which three U.S. citizens were killed and one was injured (see ¶¶ 207-208, *supra*). *See* Kaufman Decl. ¶ 7.

442. Attached as Exhibit 191 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

c. Tha [REDACTED]

[REDACTED]

443. Attached as Exhibit 192 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

444. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

445. ***Jamal Fatah Tzabich Al Hor.*** On June 9, 1996, U.S. citizen Yaron Ungar, his wife, and his 9-month-old son were traveling home from a wedding near Beit Shemesh when terrorists connected to Hamas “opened fire on the Ungars’ car with two Kalashnikov machine guns,” killing Yaron Ungar and his wife. *Estates of Ungar ex rel. Strachman v. Palestinian Authority*, 153 F. Supp. 2d 76, 82–83 (D.R.I. 2001). This declaration refers to the attack as the “June 9, 1996 Attack.” This declaration refers to the attack as the “June 9, 1996 Attack.”

446. “Jamal Fatah Tzabich Al Hor” was convicted for his role in perpetrating the June 9, 1996 Attack. *See* Kaufman Decl. ¶ 8.

447. Attached as Exhibit 193 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

c. [REDACTED]

448. Attached as Exhibit 194 is a true and correct copy of [REDACTED]

449. [REDACTED]

450. ***Raid Fakhri Abu Hamadiyah.*** “Raid Fakhri Abu Hamadiyah” was convicted for his role in perpetrating the June 9, 1996 Attack that injured a U.S. citizen (see ¶ 445, *supra*). *See* Kaufman Decl. ¶ 8.

451. Attached as Exhibit 195 is a true and correct copy of [REDACTED]

a. [REDACTED]
[REDACTED]
[REDACTED]

b. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

c. [REDACTED]
[REDACTED]
[REDACTED]

452. Attached as Exhibit 196 is a true and correct copy of [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

453. [REDACTED]
[REDACTED]
[REDACTED]

454. ***Abbas al-Sayed.*** “Abbas al-Sayed” was convicted for his role in perpetrating the March 27, 2002 Attack that injured two U.S. citizens (*see ¶¶ 95-96, supra*). *See* Kaufman Decl. ¶ 8.

455. Attached as Exhibit 197 is a true and correct copy of [REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

456. Attached as Exhibit 198 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

457. [REDACTED]

[REDACTED]

[REDACTED]

458. ***Abdallah Yihya Sharbati.*** “Abdallah Yihya Sharbati” pleaded guilty for his role in perpetrating the August 19, 2003 Attack that injured seven U.S. citizens (see ¶¶ 262-264, *supra*). See Kaufman Decl. ¶ 7.

459. Attached as Exhibit 199 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

[REDACTED]

d. [REDACTED]

[REDACTED]

460. Attached as Exhibit 200 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

461. [REDACTED]

[REDACTED]

[REDACTED]

462. **Abdullah Ghaleb Abdullah Barghouti.** “Abdullah Ghaleb Abdullah Barghouti” pleaded guilty for his role in perpetrating the July 31, 2002 Attack that injured thirteen U.S. citizens (see ¶ 395, *supra*). See Kaufman Decl. ¶ 7.

463. Attached as Exhibit 201 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

464. Attached as Exhibit 202 are true and correct copies of [REDACTED]

465. [REDACTED]

466. *Ahmad Khaled Dawud Hamed*. The following U.S. citizens received a judgment in the United States District Court for the Eastern District of New York under 18 U.S.C. § 2333 for injuries caused by an attack on June 20, 2003 in Israel: Eugene Goldstein, Lorraine Goldstein, Barbara Goldstein-Ingardia, Michael Goldstein, and Chana Freedman. *See* Stipulation to Enter Final Judgment, *Linde v. Arab Bank*, No. 06-cv-1623 (BMC) (PK) (E.D.N.Y. May 24, 2016), ECF No. 1098.

467. “Ahmad Khaled Dawud Hamed” pleaded guilty for his role in perpetrating the attack. *See* Kaufman Decl. ¶ 7.

468. Attached as Exhibit 203 is a true and correct copy of [REDACTED]

a.

b.

c.

469. Attached as Exhibit 204 are true and correct copies of

470.

471. *Ahmed Hamad Rushdie Hadib and Tamar Rassem Salim Rimawi*. “Ahmed Hamad Rushdie Hadib” and “Tamar Rassem Salim Rimawi” pleaded guilty for their roles in

perpetrating the March 24, 2002 Attack that killed a U.S. citizen (*see ¶ 334, supra*). *See* Kaufman Decl. ¶ 7.

472. Attached as Exhibit 205 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

473. Attached as Exhibit 206 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

474. [REDACTED]

[REDACTED]

[REDACTED]

475. Attached as Exhibit 207 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

476. Attached as Exhibit 208 are true and correct copies of [REDACTED]

[REDACTED]

477. [REDACTED]

478. *Ali Mohamed Abu-Haliel*. “Ali Mohamed Abu-Haliel” was convicted for his role in perpetrating the January 29, 2004 Attack that injured eight U.S. citizens (see ¶ 118, *supra*). See Kaufman Decl. ¶ 8.

479. Attached as Exhibit 209 is a true and correct copy of [REDACTED]

a. [REDACTED]

b. [REDACTED]

c. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

480. Attached as Exhibit 210 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

481. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

482. *Bilal Yaqub Ahmed Barghouti*. “Bilal Yaqub Ahmed Barghouti” pleaded guilty for his role in perpetrating the August 9, 2001 Attack that injured or killed twelve U.S. citizens (see ¶¶ 66-67, *supra*). See Kaufman Decl. ¶ 7.

483. Attached as Exhibit 211 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

484. Attached as Exhibit 212 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

485. [REDACTED]

[REDACTED]

[REDACTED]

486. ***Fahmi Id Ramadan Mashahara.*** On June 18, 2002, a suicide terrorist connected to Hamas boarded the Egged Bus No. 32 near Gilo and detonated an explosive device, killing 19 and injuring 50. *See Ex Suicide Terrorists in the Current Conflict*, ISRAELI SECURITY AGENCY at 8 (a copy of the relevant sections of the translated report is attached as Exhibit 44); Declaration of Itzhak Ilan 1–3, *Shatsky v. Syrian Arab Republic*, No. 08-cv-0496 (RJL) (D.D.C. Sept. 15, 2020), ECF No. 50-1.

487. As a result of the attack, the following U.S. citizens were killed or injured: Moshe Gottlieb, Sheila Gottlieb, Seymour Gottlieb, Faye Chana Benjaminson, and Gila Aluf. Based on their injuries, the above-named victims brought federal actions under 18 U.S.C. § 2333 and other statutes against Arab Bank, PLC. *See Second Amended Complaint, Litle v. Arab Bank, PLC*, No. 04-cv-5449 (NG) (VP) (E.D.N.Y. Apr. 10, 2007), ECF No. 307; Complaint, *Coulter v. Arab Bank, PLC*, No. 05-cv-0365 (E.D.N.Y. Jan. 21, 2005), ECF No. 1. *See also* Kaufman Decl. ¶ 11 (discussing court documents that note Moshe Gottlieb as a victim in this attack). The complaints, signed by attorneys Mark S. Werbner of Sayles Werbner P.C. and Gary M. Osen of Osen & Associate, LLC, state that the above-named victims were U.S. citizens. *See Second Amended Complaint* at 16-17, 107; Complaint at 69, 109.

488. “Fahmi Id Ramdan Mashahara” was convicted for his role in perpetrating the attack. *See* Kaufman Decl. ¶ 8.

489. Attached as Exhibit 213 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
c. [REDACTED]
[REDACTED]
[REDACTED]
d. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
e. [REDACTED]
[REDACTED]

490. Attached as Exhibit 214 are true and correct copies of [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

491. [REDACTED]
[REDACTED]
[REDACTED]

492. ***Hassan Abdel Rahman Hassan Salameh.*** “Hassan Abdel Rahman Hassan Salameh” (“Hassan Salameh”) was convicted for his role in perpetrating the February 25, 1996 Attack in which three U.S. citizens were killed and one U.S. citizen was injured (see ¶¶ 207-208, *supra*). *See* Kaufman Decl. ¶ 8.

493. Attached as Exhibit 215 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

494. Attached as Exhibit 216 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

495. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

496. ***Ibrahim Adnan Najib Abdel Hai.*** “Ibrahim Adnan Najib Abdel Hai” (“Abdel Hai”) pleaded guilty for his role in perpetrating the January 22, 2002 Attack that injured seven U.S. citizens (*see ¶ 280, supra*). *See* Kaufman Decl. ¶ 7.

497. Attached as Exhibit 217 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

d. [REDACTED]

[REDACTED]

498. Attached as Exhibit 218 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

499. [REDACTED]

[REDACTED]

[REDACTED]

500. ***Ibrahim Yusuf Ibrahim Atiya.*** “On June 17, 2003, the Leibovitch family was traveling along the Trans–Israel Highway, just west of the town of Kalkilya, Israel. Members of the Palestine Islamic Jihad [] terrorist organization opened fire with Kalashnikov machine guns and pistols on the family’s Mazda mini–van,” severely injuring U.S. citizen Shira Leibovitch. *Leibovitch v. Syrian Arab Republic*, No. 08 C 1939, 2011 WL 444762, at *1 (N.D. Ill. Feb. 1,

2011), *rev'd on other grounds sub nom. Leibovitch v. Islamic Republic of Iran*, 697 F.3d 561 (7th Cir. 2012). This declaration refers to the attack as the “June 17, 2003 Attack.”

501. “Ibrahim Yusuf Ibrahim Atiya” (“Ibrahim Atiya”) was convicted for his role in perpetrating the June 17, 2003 Attack. *See* Kaufman Decl. ¶ 8.

502. Attached as Exhibit 219 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

503. Attached as Exhibit 220 is a true and correct copy of [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

504. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

505. ***Mohammed Mustafa Mohammed Abu Dura.*** “Mohammed Mustafa Mohammed Abu Dura” was convicted for his role in perpetrating the June 17, 2003 Attack that injured one U.S. citizen (*see ¶ 500, supra*). *See* Kaufman Decl. ¶ 8.

506. Attached as Exhibit 221 is a true and correct copy of [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
a. [REDACTED]
[REDACTED]
[REDACTED]
b. [REDACTED]
[REDACTED]
[REDACTED]

c. [REDACTED]
[REDACTED]
[REDACTED]

507. Attached as Exhibit 222 is a true and correct copy of [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

508. [REDACTED]
[REDACTED]
[REDACTED]

509. ***Muayad Hamad.*** U.S. citizens Jacob Steinmetz and Deborah Steinmetz were injured in a terrorist attack on January 29, 2003, when two masked men shot at their car as they were driving on Route 60 in Israel. *See Weiss v. Nat'l Westminster Bank PLC*, 453 F. Supp.2d 609, 620 (E.D.N.Y. 2006); Kaufman Decl. ¶ 11 (discussing court documents that note Jacob Steinmetz as a victim in this attack).

510. “Muayad Hamad” was convicted for his role in perpetrating the attack. *See* Kaufman Decl. ¶ 8.

511. Attached as Exhibit 223 is a true and correct copy of [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

512. Attached as Exhibit 224 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

513. [REDACTED]

[REDACTED]

[REDACTED]

514. ***Mohamed Abdel Rahman Salem Mousleh.*** “Mohamed Abdel Rahman Salem Mousleh” (“Mousleh”) pleaded guilty for his role in perpetrating the January 22, 2002 Attack that injured seven U.S. citizens (*see ¶ 280, supra*). *See* Kaufman Decl. ¶ 7.

515. Attached as Exhibit 225 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

516. Attached as Exhibit 226 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

517. [REDACTED]

[REDACTED]

[REDACTED]

518. ***Mohammed Arman.*** “Mohammed Arman” was convicted for his role in perpetrating the July 31, 2002 Attack that injured twelve U.S. citizens, and was paid by Defendants by reason of his imprisonment (*see ¶ 395, supra*). *See* Plaintiffs’ Trial Exhibits 39, 72, 1035, 1120, *Sokolow v. Palestine Liberation Org.*, No 04-cv-0397 (S.D.N.Y. 2015), ECF Nos. 927-20, 927-35, 927-97, 910-53.

519. Attached as Exhibit 227 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

d. [REDACTED]

[REDACTED]

[REDACTED]

520. Attached as Exhibit 228 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

521. [REDACTED]

[REDACTED]

[REDACTED]

522. ***Mohamed Ma'ali***. “Mohamed Ma’ali” pleaded guilty for his role in perpetrating the January 29, 2004 Attack that injured eight U.S. citizens (*see ¶ 118, supra*). *See* Kaufman Decl. ¶ 7.

523. Attached as Exhibit 229 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

524. Attached as Exhibit 230 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

525. [REDACTED]

[REDACTED]

[REDACTED]

526. ***Nasser Jamal Mussa Shawish.*** “Nasser Jamal Mussa Shawish” (“Shawish”) was convicted for his role in perpetrating the March 21, 2002 Attack that injured five U.S. citizens (see ¶ 218, *supra*). *See* Kaufman Decl. ¶ 8.

527. Attached as Exhibit 231 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

d. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

e. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

528. Attached as Exhibit 232 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

529. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

530. ***Omar Salah Sharif.*** “Omar Salah Sharif” pleaded guilty for his role in perpetrating the June 11, 2003 Attack that injured nine U.S. citizens (see ¶¶ 36-37, *supra*). *See* Kaufman Decl. ¶ 7.

531. Attached as Exhibit 233 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

[REDACTED]

532. Attached as Exhibit 234 is a true and correct copy of [REDACTED]

[REDACTED]

533. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

534. *Raed Al-Hutari*. “Raed Al-Hutari” was convicted for his role in perpetrating the June 1, 2001 Attack that injured a U.S. national (see ¶¶ 274-275, *supra*). *See* Kaufman Decl. ¶ 8.

535. Attached as Exhibit 235 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]

[REDACTED]

536. Attached as Exhibit 236 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

537. [REDACTED]

[REDACTED]

[REDACTED]

538. ***Samer Atrash.*** “Samer Atrash” pleaded guilty for his role in perpetrating the May 18, 2003 Attack that killed or injured nine U.S. citizens (see ¶¶ 144-145, *supra*). *See* Kaufman Decl. ¶ 7.

539. Attached as Exhibit 237 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

a. [REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

c. [REDACTED]
[REDACTED]
[REDACTED]

540. Attached as Exhibit 238 is a true and correct copy of [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

541. [REDACTED]
[REDACTED]
[REDACTED]

542. ***Abdul Rahman Maqdad and Ahmed Sa'ad.*** “Ahmed Sa’ad” and “Abdul Rahman Maqdad” were convicted for their roles in perpetrating the January 29, 2004 Attack that injured eight U.S. citizens (*see ¶ 118, supra*). *See* Kaufman Decl. ¶ 8.

543. Attached as Exhibit 239 are true and correct copies of [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

544. [REDACTED]
[REDACTED]
[REDACTED]

545. Attached as Exhibit 240 are true and correct copies of [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

546. [REDACTED]
[REDACTED]
[REDACTED]

547. ***Ahmed Ali Mahmoud Abu-Khader.*** “Ahmed Ali Mahmoud Abu-Khader” (“Khader”) pleaded guilty for his role in perpetrating the January 17, 2002 Attack that killed or injured fifteen U.S. citizens (see ¶¶ 101-102, *supra*). *See* Kaufman Decl. ¶ 7.

548. Attached as Exhibit 241 are true and correct copies of [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

549. [REDACTED]
[REDACTED]
[REDACTED]

550. ***Asem Umar Saleh al-Barghouti and Anees Ahmd Yosef Mashal.*** On the morning of December 13, 2018, Asem Ummar Saleh al-Barghuthi opened fire on a group of civilians and soldiers standing at a hitchhiking stop, killing two and leaving U.S. citizen Nathaniel Felber with a permanent, severe brain injury. *See Felber v. Islamic Republic of Iran*, No. 19-cv-1027 (D.D.C. Aug. 3, 2020) (D.E. No. 28); Proposed Findings of Fact ¶¶ 88, 108, 120, 132, 167, *Felber v. Islamic Republic of Iran*, No. 19-cv-1027 (D.D.C. Aug. 6, 2020), ECF

No. 30; Complaint, *Felber v. Islamic Republic of Iran*, No. 19-cv-1027 (D.D.C. Apr. 12, 2019), ECF No. 1.

551. “Asem Umar Saleh al-Barghouti” and “Anees Ahmd Yosef Mashal” pleaded guilty for their roles in perpetrating the attack. *See* Kaufman Decl. ¶ 7.

552. Attached as Exhibit 242 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

553. [REDACTED]

[REDACTED]

[REDACTED]

554. Attached as Exhibit 243 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

555. [REDACTED]

[REDACTED]

[REDACTED]

556. ***Fares Sadeq Mohamed Ghanem.*** “Fares Sadeq Mohamed Ghanem” was convicted for his role in perpetrating the January 22, 2002 Attack that injured seven U.S. citizens (see ¶ 280, *supra*). *See* Kaufman Decl. ¶ 8.

557. Attached as Exhibit 244 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

558. [REDACTED]

[REDACTED]

[REDACTED]

559. ***Karam Lutfi Fatahi Razek Al Masri.*** “Karam Lutfi Fatahi Razek Al Masri” pleaded guilty for his role in perpetrating the October 1, 2015 Attack in which a U.S. citizen was shot (*see ¶ 354, supra*). *See* Kaufman Decl. ¶ 7.

560. Attached as Exhibit 245 are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

561. [REDACTED]

[REDACTED]

[REDACTED]

562. ***Muhammad Amoudi.*** “Muhammad Amoudi” pleaded guilty for his role in perpetrating the April 17, 2006 Attack that injured four U.S. citizens (*see ¶¶ 290-291, supra*). *See* Kaufman Decl. ¶ 7.

563. Attached as Exhibit 246 are true and correct copies of [REDACTED]

[REDACTED]

564. [REDACTED]

565. ***Samach Samir Mohammed Shubaki.*** “Samach Samir Mohammed Shubaki” was convicted for his role in perpetrating the June 17, 2003 Attack that injured a U.S. citizen (see ¶ 500, *supra*). *See* Kaufman Decl. ¶ 8.

566. Attached as Exhibit 247 are true and correct copies of [REDACTED]

567. [REDACTED]

568. ***Wael al-Qassim.*** “Wael al-Qassim” was convicted for his role in perpetrating the July 31, 2002 Attack that injured twelve U.S. citizens (see ¶ 395, *supra*), and was paid by Defendants by reason of his imprisonment. *See* Plaintiffs’ Trial Exhibits 41, 71, 152, and 1120, *Sokolow v. Palestine Liberation Org.*, No. 04-cv-0397 (GBD) (S.D.N.Y.), ECF Nos. 927-22, 927-34, 927-76, and 910-53.

569. Attached as Exhibit 248 are true and correct copies of [REDACTED]

570. [REDACTED]

[REDACTED]

[REDACTED]

Other Documents Relevant to the Disposition of Defendants' Motion

571. Attached as Exhibit 250 is a true and correct copy of a letter from Hon. Rami Hamdallah to Hon. Michael R. Pompeo, dated December 26, 2018 (U.S. Resp. to Feb. 6, 2019, Order, Ex. 1, *Klieman v. Palestinian Auth.*, No. 15-7034 (D.C. Cir. Feb. 15, 2019)), Doc. No. 1773566.

572. Attached as Exhibit 251 is a true and correct copy of the Memorandum of Law in Support of the Government's Intervention in Defense of the Promoting Security and Justice for Victims of Terrorism Act of 2019, *Fuld v. Palestine Liberation Org.*, No. 1:20-cv-03374-JMF (July 23, 2021), ECF No. 53.

573. Attached as Exhibit 252 is a true and correct copy of the Declaration of Yaniv Berman, dated October 1, 2021 certifying the translation of certain documents produced in this action and referred to in this Declaration and Plaintiffs' Opposition Brief.

574. Attached as Exhibit 256 is a true and correct copy of a stipulation between the parties to this action, dated August 3, 2021, that the entirety of the following video recordings are authentic for the purposes of Rule 901 of the Federal Rules of Evidence and satisfy the requirements of Rule 1002 of the Federal Rules of Evidence:

- a. A February 21, 2020 TRT Interview with Dr. Riyad Mansour, available at <https://www.youtube.com/watch?v=YiFm25C4N9U>. A certified, translated transcript of this interview is attached as Exhibit 257.
- b. An October 22, 2020 Interview of Dr. Riyad Mansour with the American-Arab Anti-Discrimination Committee, available at https://www.facebook.com/watch/live/?v=706628353543937&ref=watch_permalink. A certified transcript of this interview is attached as Exhibit 258.
- c. A November 14, 2020 appearance by Dr. Riyad Mansour at the Beit Sahour USA Virtual Convention, available at <http://www.youtube.com/watch?v=WTZtpXDiXTg&feature=youtu.be>. A certified, translated transcript of this appearance is attached as Exhibit 259.
- d. A November 19, 2020 Seton Hall University interview with Dr. Riyad Mansour, available at <https://www.youtube.com/watch?v=MjtMIurFfaY>. A certified transcript of this interview is attached as Exhibit 260.
- e. An April 6, 2021 Bridgewater State University interview with Dr. Riyad Mansour, available at https://www.youtube.com/watch?v=l4UIajoxO_c. A certified transcript of this interview is attached as Exhibit 261.
- f. A May 19, 2021 interview with Dr. Riyad Mansour on MSNBC's "Morning Joe" program, available at https://www.msnbc.com/morning-joe/watch/we-need-an-immediate-ceasefire-says-ambassador-112457285708?fbclid=IwAR20L8djkOkajL0GzdhvLYKyEbV-iiAS1656E08HQc261XQhneME_ecQIc. A certified transcript of this interview is attached as Exhibit 262.

g. A May 22, 2021 interview of Dr. Riyad Mansour by Al Jazeera, available at <https://www.youtube.com/watch?v=NtB1FETUqRw>. A certified, translated transcript of this appearance is attached as Exhibit 263.

575. Attached as Exhibit 264 is a true and correct copy of excerpts of the transcript of the deposition of Feda Abdelhady Nasser, conducted on July 22, 2021, and Exhibit 7 thereto.

576. Attached as Exhibit 265 is a true and correct copy of Exhibit 3 to the transcript of the deposition of Riyad Mansour, conducted on July 8, 2021, bearing production numbers Shatsky-JD00545 to Shatsky-JD00550.

577. Attached as Exhibit 266 is a true and correct copy of Exhibit 2 to the transcript of the deposition of Nadia Ghannam conducted on July 23, 2021.

578. Attached as Exhibit 267 is a true and correct copy of Exhibit 6 to the transcript of the deposition of Nadia Ghannam conducted on July 23, 2021.

579. Attached as Exhibit 268 is a true and correct copy of Exhibit 7 to the transcript of the deposition of Nadia Ghannam conducted on July 23, 2021.

580. Attached as Exhibit 269 is a true and correct copy of Exhibit 8 to the transcript of the deposition of Nadia Ghannam conducted on July 23, 2021.

581. Attached as Exhibit 270 is a true and correct copy of Exhibit 9 to the transcript of the deposition of Nadia Ghannam conducted on July 23, 2021.

582. Attached as Exhibit 271 is a true and correct copy of Exhibit 10 to the transcript of the deposition of Nadia Ghannam conducted on July 23, 2021.

583. Attached as Exhibit 272 is a true and correct copy of Exhibit 11 to the transcript of the deposition of Nadia Ghannam conducted on July 23, 2021.

584. Attached as Exhibit 273 is a true and correct copy of Exhibit 12 to the transcript of the deposition of Nadia Ghannam conducted on July 23, 2021.

585. Attached as Exhibit 274 is a true and correct copy of Exhibit 13 to the transcript of the deposition of Nadia Ghannam conducted on July 23, 2021.

586. Attached as Exhibit 275 is a true and correct copy of Exhibit 14 to the transcript of the deposition of Nadia Ghannam conducted on July 23, 2021.

587. Attached as Exhibit 276 is a true and correct copy of Exhibit 15 to the transcript of the deposition of Nadia Ghannam conducted on July 23, 2021.

588. Attached as Exhibit 277 is a true and correct copy of Exhibit 16 to the transcript of the deposition of Nadia Ghannam conducted on July 23, 2021.

589. Attached as Exhibit 278 is a true and correct copy of Exhibit 17 to the transcript of the deposition of Nadia Ghannam conducted on July 23, 2021.

590. Attached as Exhibit 279 is a true and correct copy of Exhibit 18 to the transcript of the deposition of Nadia Ghannam conducted on July 23, 2021.

591. Attached as Exhibit 280 is a true and correct copy of Exhibit 19 to the transcript of the deposition of Nadia Ghannam conducted on July 23, 2021.

592. Attached as Exhibit 281 is a true and correct copy of Exhibit 20 to the transcript of the deposition of Nadia Ghannam conducted on July 23, 2021.

593. Attached as Exhibit 282 is a true and correct copy of Exhibit 21 to the transcript of the deposition of Nadia Ghannam conducted on July 23, 2021.

594. Attached as Exhibit 283 is a true and correct copy of Exhibit 22 to the transcript of the deposition of Nadia Ghannam conducted on July 23, 2021.

595. Attached as Exhibit 284 is a true and correct copy of Exhibit 23 to the transcript of the deposition of Nadia Ghannam conducted on July 23, 2021.

596. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: October 4, 2021
New York, NY



Oliver S. Haker